



DEPARTMENT OF THE ARMY
FORT WINGATE DEPOT ACTIVITY
P.O. BOX 268
FORT WINGATE, NM 87316

November 28, 2017

Mr. John Kieling
Chief, Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

RE: *Army's Response to Comments, NMED Disapproval letter dated October 31, 2017, Final Groundwater Supplemental RCRA Facility Investigation Work Plan Revision 2, Fort Wingate Depot Activity, New Mexico*

Dear Mr. Kieling:

This letter is in reply to the NMED Disapproval letter dated October 31, 2017, reference number HWB-FWDA-15-001, regarding the Final Groundwater Supplemental RCRA Facility Investigation Work Plan Revision 2. The following are the Army's response to comments received from NMED in the letter, detailing where each comment was addressed and cross-referencing the numbered NMED comments. This letter also transmits the revised work plan, and a red-line strike-out electronic copy of the edits.

Comments

1. Figure 2-1, Alluvial Contamination Plumes and Proposed Well Locations

NMED Comment:

- a. The nitrate and perchlorate plumes are not depicted on the figure. In the Permittee's response to NMED Comment 6 in the *Disapproval letter*, dated March 21, 2017, the Permittee agreed to utilize the October 2016 plume delineation for the figure.

Army Response, Figure 2-1: The nitrate and perchlorate plumes have been added to Figure 2-1 utilizing the October 2016 groundwater analytical data.

NMED Comment:

- b. Comment 6 in the *Disapproval Letter for RCRA Facility Investigation Report Parcel 7*, dated August 7, 2017, directed the Permittee to propose installation of a replacement well for FW26 to assess groundwater contamination for the POL Waste Discharge Area. Revise Figure 2-1 to include the new well and update Table 3-1, *New Groundwater Monitoring Well Rationale and Sampling Matrix*, accordingly.

Army Response, Figures 2-1, 5-1, 5-3, and 9-1; Table 3-1; Sections 5.4.1 and 9.1:

Figure 2-1 has been revised to include new proposed well MW34 to replace the abandoned well FW26. Table 3-1 was updated to include MW34. Figures 5-1 and 5-3 were revised to include MW34 as an alluvial nitrate well, with text added in Section 5.4.1 and new Section 9.1 outlining the purpose of MW34. This well will be included as a supplemental well to define the western edge of the nitrate plume. New Section 9.1 also describes this replacement well and its future use. A new Figure 9-1 was created to show the site location of proposed well MW34 in relation to SWMU 9 and the abandoned well FW26. Sampling of MW34 will be consistent with the analytical suite listed in this Groundwater RFI Work Plan, with the exception of TPH-ORO. This analysis will be captured in the Parcel 7 RFI Report.

NMED Comment:

- c. The concentrations of several metals in groundwater samples collected from well FW35 before it went dry exceeded the screening levels. Therefore, the Permittee must propose installation of a replacement well for FW35. Update Table 3-1 accordingly.

Army Response, Figure 2-1 and 9-2; Table 3-1; Section 9.1: A new Section 9.1 was created to discuss the purpose of the new proposed well MW35. New Figure 9-2 was created to show the location of proposed well MW35, which is to replace dry well FW35. Table 3-1 has been updated to document replacing dry monitoring well FW35 with MW35. As the location of FW35 and new well MW35 is out of the view of Figure 2-1, a note was added in the legend of Figure 2-1 acknowledging well MW35 and referencing new Figure 9-2.

NMED Comment:

- d. In the Groundwater Periodic Monitoring Report, January through June 2016, dated September 2017, the Permittee states, installation of additional background monitoring wells is planned and will be included in a revised Northern Area background evaluation [of metals concentrations]. The revised work plan for the Supplemental RFI will be submitted to NMED in August 2017 (Sundance, 2017)." It appears that installation of background wells is not proposed in this Work Plan. The Permittee must propose installation of additional background monitoring wells for the evaluation of metal concentrations. Revise Figure 2-1 to include the proposed new well(s) and update Table 3-1 accordingly.

Army Response, Section 8.1.5.2 and Section 9.2: *Fort Wingate Depot Activity Groundwater Monitoring Northern Area Background Well Installation Letter Work Plan*, submitted to NMED on October 31, 2017, outlines the rationale and installation of four additional bedrock background monitoring wells. New Section 9.2 has been added to acknowledge the proposed background monitoring wells within this Work Plan, and references the Letter Work Plan for additional detail. Section 8.1.5.2, *Metals Background Evaluation: Part 2*, has been revised to reference the Letter Work Plan and indicate the sampling analytical results will be included in the Northern Area RFI Report. As the Letter Work Plan covers analytical sampling, referencing the full analytical suite associated with the FWDA groundwater monitoring program, no changes to Table 3-1 were made. Locations of the proposed monitoring wells are depicted in the Letter Work Plan figures, so they were not included on Figure 2-1 of this RFI work plan.

2. The Permittee's Response to Comment 11 of the Disapproval

Permittee Statement: *If Pro UCL recommends multiple UCLs, professional judgment may be applied in selecting the most appropriate UCL, but often, the maximum UCL will be selected.*

NMED Comment: Information regarding the use of professional judgement or selection criteria has not been incorporated into the Work Plan. Revise Section 8.1.5.3.2, *Step 2: Refined Cumulative Risk Evaluation*, to indicate that if Pro UCL recommends multiple UCLs, professional judgment may be used in selecting the most appropriate UCL, with the maximum UCL selected in most cases. In addition, state that any criteria used in selecting the appropriate UCL will be documented in the risk evaluation report.

Army Response, Section 8.1.5.3.2, Step 2: Refined Cumulative Risk Evaluation, Page 8-7, Lines 9-10: Concur. The following text was added to the RFI Work Plan: "If Pro UCL recommends multiple UCLs, professional judgement may be used in selecting the most appropriate UCL, with the maximum UCL selected in most cases. Any criteria used in selecting the appropriate UCL and justification for the choices made in the selection of the UCL will be documented in the risk evaluation report."

3. The Permittee's Response to Comment 12 of the Disapproval

Permittee Statement: "During the reporting phase of this project, the Army will contact NMED and discuss any site-specific data and methodologies used in applying calculations if such refinements are deemed necessary to use with the dataset."

NMED Comment: While the Permittee's response indicates that the Permittee will contact NMED to discuss any site-specific data and methodologies to be used, if refinements to the risk evaluation are necessary, this information is not included in the Work Plan. Revise Section 8.1.5.3.2 to state that the Permittee will contact NMED to discuss any site-specific data and methodologies to be used if refinements to the risk evaluation are necessary.

Army Response, Section 8.1.5.3.2, Step 2: Refined Cumulative Risk Evaluation, Page 8-8, Lines 1-2: Concur. The following text was added to the RFI Work Plan: "The U.S. Army will contact NMED to discuss any site-specific data and methodologies to be used if refinements to the risk evaluation are necessary."

4. The Permittee's Response to Comment 14 of the Disapproval

Permittee Statement: "Professional judgement may be applied in selecting the most appropriate UCL calculated by Pro UCL, as allowed by NMED risk guidance (Section 2.8.5). In these cases, the justification for the choices that are made in selecting a UCL to use in the refined risk evaluation will be documented in the risk evaluation report."

NMED Comment: The Permittee's response has not been incorporated into the Work Plan. Revise Section 8.1.5.3.2 to address the issue. See Comment 2.

Army Response, Section 8.1.5.3.2, Step 2: Refined Cumulative Risk Evaluation, Page 8-7, Lines 9-10: Concur. The following text was added to the Work Plan: "If Pro UCL recommends multiple UCLs, professional judgement may be used in selecting the most appropriate UCL, with the maximum UCL selected in most cases. Any criteria used in selecting the appropriate UCL and justification for the choices made in the selection of the UCL will be documented in the risk evaluation report."

5. Section 8.1.1, Introduction, lines 5-8, page 8-1

Permittee Statement: "The human health risk evaluation will assess potential health risks to residential receptors as required by Section 7 .1 and Section 7 .3 of Attachment 7 of the RCRA permit (NMED, 2015a), and following the NMED *Risk Assessment Guidance for Site Investigations and Remediation* (NMED, 2017 Revised)."

NMED Comment: The statement does not mention the construction worker and commercial/industrial worker exposure scenarios that are addressed in the screening level risk evaluation in Section 8.1.2, *Conceptual Site Model*. Indicate that health risks to construction workers and commercial/industrial workers will be assessed in the screening level risk evaluation in the risk evaluation report.

Army Response, Section 8.1.1, Introduction, Page 8-1 lines 8-10: Concur. The following sentence was added to the Work Plan to indicate the commercial industrial worker and construction workers will be addressed: "A commercial/industrial worker and construction worker are also addressed in the risk evaluation, consistent with the receptor types identified in the NMED risk guidance."

6. Section 8.1.5.3.2, Step 2: Refined Cumulative Risk Evaluation, lines 1-6, page 8-8

NMED Comment: The results of the screening level risk evaluation are not listed among the topics for discussion. Propose to include presentation and discussion of the results of the screening level risk valuation in the risk evaluation report.

Army Response, Section 8.1.5.3.2, Step 2: Refined Cumulative Risk Evaluation, lines 10: Concur. A bullet was added listing "The results of the screening level risk evaluation" to the list of topics to be discussed in the risk evaluation portion of the RFI report.

If you have questions or require further information, please call me at (505) 721-9770.

Sincerely,

PATTERSON.MAR Digitally signed by
PATTERSON.MAR.C.1229214493
DN: c=US, o=U.S. Government, ou=DoD, ou=PKI,
ou=USA, cn=PATTERSON.MAR.C.1229214493
Date: 2017.11.29 16:06:16 -0500
K.C.1229214493

Mark Patterson
BRAC Environmental Coordinator

Enclosures

CF:

Media

D Cobrain, NMED HWB
B Wear, NMED HWB
M Suzuki, NMED HWB
M Patterson, FWDA BEC
S Smith, USACE
S Khan, USACE SWT