



DEPARTMENT OF THE ARMY
OFFICE OF THE DEPUTY CHIEF OF STAFF, G-9
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

October 18, 2021

Base Realignment and Closure Operations Branch

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

RE: Final Hazardous Waste Management Unit Progress Status Report, 2020, Parcel 3, Army's Response to Comments, HWB-FWDA-21-002, Fort Wingate Depot Activity, McKinley County, New Mexico. EPA# NM6213820974

Dear Mr. Maestas:

This letter is in reply to the New Mexico Environment Department (NMED) Letter of Approval with Modifications dated September 9, 2021, Reference Number HWB-FWDA-21-002, Final Hazardous Waste Management Unit Progress Status Report, 2020, Parcel 3. The following are Army's response to NMED comments detailing where each comment has been addressed in the revised Work Plan and cross referencing the numbered NMED comments.

Comments:

Comment No. 1: Section 3.1 Soil Sampling Results, lines 15-21, page 3-1

Permittee Statement: "Table 3-2 summarizes chemicals with a detection limit greater than the NMED SSL. One chemical (N-Nitrosodimethylamine) exhibited this quality. There were no detections of N-Nitrosodimethylamine in any of the soil samples submitted for laboratory analysis. Until recently, laboratory instrumentation did not allow for the N-Nitrosodimethylamine detection limit to meet the screening level. The Army is aware of this issue and recognizes the NMED considers this a data quality issue. The Army is currently working with the NMED on resolution of this issue."

NMED Comment: NMED has already provided the Permittee the specific direction to resolve this recurring issue through the February 1, 2021 email from Mr. Wear of NMED to Mr. Cushman of FWDA. Resolve this issue in a timely manner.

Army Response: Concur. The Army has finalized a contracting action to achieve an N-nitrosodimethylamine detection limit below the screening level. The third paragraph of Section 3.1 has been revised as follows: "The Army is aware of this issue and recognizes that NMED considers this a data quality issue. The Army has finalized a contracting action to achieve an N-nitrosodimethylamine detection limit below the screening level for soil sampling conducted for the remainder of this contract."

Comment No. 2: Section 4, Summary, lines 30-32, page 4-1

Permittee Statements: "Three stockpile samples exceeded the cancer risk of 1.0E-05. Fourteen stockpile samples exhibited a hazard index that exceeded 1.0 for two target organs. A summary of the stockpile soil samples that exceeded risk screening levels included in Table 3-3."

NMED Comment: Section 1.4.2, HWMU, lines 33-38, page 1-3, states, "[i]f the stockpile soil sample results indicated that screening criteria were exceeded but were below hazardous waste disposal criteria (see Table 1-1 for list of analytes), the soil was classified as non-hazardous waste and was hauled to the Northwest New Mexico Regional Solid Waste Authority landfill. The soil was classified as non-hazardous waste. No hazardous waste was generated in the HWMU during the 2020 removal activities."

The fate of stockpile soils containing contaminant concentrations exceeding residential screening levels is not discussed in the Summary section. Include a discussion regarding the fate of the stockpile soils in the Summary section of the Report and provide replacement pages.

In addition, the concentrations of the analytes listed in Table 1-1, *Hazardous Waste Disposal Analyte List*, page 11 of 1,564, were presumably compared with disposal screening criteria to classify the stockpile soils; however, disposal screening criteria are not presented in Table 1-1. Revise Table 1-1 to include disposal screening criteria and prepare a separate table that presents comparison of the contaminant concentrations with the disposal screening criteria. Furthermore, Section 1.4.2 indicates that the contaminant concentrations in the stockpile soils did not exceed the disposal screening criteria and the soils were hauled to the landfill. If so, provide a copy of the waste manifest.

Army Response: Concur. To clarify, the following text will be added to the third paragraph of the Summary section on Page 4-1: "...were segregated for later disposal at a licensed, off-site landfill. *No transport and disposal of contaminated stockpile soil was conducted in 2020. Transport and disposal will occur in the future once enough soil is stockpiled to maximize trucking efficiency and to minimize downtime of excavation/soil processing activities that will need to be stopped while loading and transport occurs. Once transport and disposal occur, a new table will be added to the current HWMU Progress Status Report to show comparison of concentrations to the disposal criteria.*"

Table 1-1 has been revised to include the disposal screening criteria, which is the TCLP Regulatory Level.

Additionally, no waste manifests have been prepared for inclusion in this 2020 HWMU Status Progress Report since no transport and disposal occurred in 2020. Waste manifests will be included in the next HWMU Status Progress Report once transport and disposal has been completed. Section 1.4.2 has been revised to indicate that the stockpiles remained on-site in 2020.

If you have questions or require further information, please contact me at George.h.cushman.civ@army.mil, 703-455-3234 (Temporary Home Office, preferred) or 703-608-2245 (Mobile).

Sincerely,



George H. Cushman IV
BRAC Environmental Coordinator
Fort Wingate Depot Activity
BRAC Operations Branch
Environmental Division

Enclosures

CF:

Dave Cobrain, NMED, HWB
Ben Wear NMED, HWB
Michiya Suzuki, NMED, HWB
Alan Soicher, USACE
Saqib Khan, USACE SWT
Mark Harrington, Pueblo of Zuni
Admin Record, NM
Admin Record, Ohio