



State of New Mexico
ENVIRONMENT DEPARTMENT



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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

October 31, 2017

Mark Patterson
BRAC Environmental Coordinator
Fort Wingate Depot Activity
13497 Elton Road
North Lima, OH 44452

Steve Smith
USACE
CESWF-PER-DD
819 Taylor Street, Room 3B06
Fort Worth, TX 76102

**RE: DISAPPROVAL
FINAL GROUNDWATER SUPPLEMENTAL RCRA FACILITY
INVESTIGATION WORK PLAN REVISION 2
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-15-001**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity's (Permittee) *Final Groundwater Supplemental RCRA Facility Investigation Work Plan Revision 2* (Work Plan), dated September 2017. NMED has reviewed the Work Plan and hereby issues this Disapproval. The Permittee must address the following comments.

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

NMED Comments:

- 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.
- 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.

- 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.
- d. In the *Groundwater Periodic Monitoring Report, January through June 2016*, dated September 2017, the Permittee states, “[i]n 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.

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

Permittee Statement: “If ProUCL 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 ProUCL 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.

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.

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 ProUCL, 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.

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.

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 evaluation in the risk evaluation report.

The Permittee must submit a revised Work Plan that addresses all comments contained in this Disapproval. In addition, the Permittee must include a response letter that cross-references where NMED's numbered comments were addressed. The Permittee must also submit an electronic redline-strikeout version of the revised Work Plan showing all changes that have been made to the Work Plan. The revised Work Plan must be submitted no later than **February 3, 2018**.

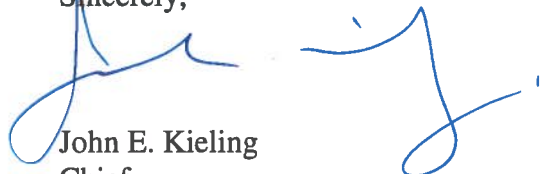
Messrs. Patterson and Smith

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Should you have any questions, please contact Ben Wear of my staff at (505) 476-6041.

Sincerely,



John E. Kieling

Chief

Hazardous Waste Bureau

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File: FWDA 2017 and Reading, Groundwater, FWDA-15-001