

DEPARTMENT OF THE ARMY OFFICE OF THE ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT 600 ARMY PENTAGON WASHINGTON, DC 20310-0600

DAIM-ODB

October 31, 2018

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

RE: Final Igloo Interior Work Plan Parcel 4, AOC 29, Igloo Block C, Fort Wingate Depot Activity, Mckinley County, New Mexico.

Dear Mr. Kieling:

This is in reply to the New Mexico Environment Department's (NMED) letters dated July 23, 2018 and September 26, 2018 regarding the Final Igloo Interior Work Plan Parcel 4, AOC 29, Igloo Block C Work Plan the Army submitted on July 13, 2018. As stated in the document cover letter, the Army must conduct an assessment of environmental conditions on the Fort Wingate Depot Activity (FWDA), to include environmental concerns that are not regulated under the Resource Conservation and Recovery Act (RCRA) Permit (# NM6213820974) administered by NMED. This requirement applies to the igloo interiors. The policies that require this assessment are found in the Base Realignment and Closure Manual, Army Regulation 200-1, the Defense Environmental Restoration Program, and the ASTM International guidance materials.

The Army submitted the document as a courtesy for your review, not as a requirement of the NMED RCRA permit for the FWDA. Therefore, the Army will not be submitting the \$10,000 fee requested in your July 23, 2018 letter. The Army and NMED have previously disagreed on the authority to regulate the interior of the igloos. However, the Army will consider the comments in your September 26, 2018 letter before conducting the work. The fieldwork is expected to start by January 31, 2018. A report of the findings will be provided for your records. At that time, the Army will be requesting that the NMED continues to process the petition for Corrective Action Complete Determination without controls submitted to your agency on September 2, 2015. The petition requested removal of Parcel 4A, AOC29 (Igloo Block C), and AOC 75 (transformer site in Parcel 2) from the RCRA permit.

If you have questions or require further information, please call me at (505) 721-9770. Mr. Ian Thomas, the BRAC Program Manager for Fort Wingate, is also available to address any questions. He can be reached at (703) 545-2536 or email: <u>ian.m.thomas2.civ@mail.mil</u>.

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Mark Patterson BRAC Environmental Coordinator



CF:

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