



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 RCRA Facility Investigation Report, Parcel 22, Revision 3.0 and the Phase 2 RCRA Facility Investigation Work Plan, Parcel 22, Extension Request, Fort Wingate Depot Activity, McKinley County, New Mexico

Dear Mr. Kieling,

The purpose of this letter is to request an extension from November 12, 2018 to August 12, 2019 for the submission of the *Final RCRA Facility Investigation Report, Parcel 22, Revision 3.0*, and from February 1, 2019 to August 12, 2019 for the Phase 2 RCRA Facility Investigation Work Plan, Parcel 22 for Fort Wingate Depot Activity, New Mexico. This is the first extension request since the disapproval letter dated May 10, 2018 in response to the revision 2.0 submittal of the report. An extension was previously requested after the disapproval notice for revision 1.0 of the report from June 30, 2014 until October 15, 2014 which is 107 days.

Parcel 22 RFI report revision 2.0, dated May 31, 2015 was submitted to NMED and disapproved. In your disapproval letter dated May 10, 2018 the submittal deadline was set for November 12, 2018. The 2018 disapproval letter comments on numerous items that were not documented in the 2014 notice of disapproval. The new comments are substantial. The contract the work was performed under is closed. The Army will require substantial time to perform contracting actions and to coordinate with the parties who worked on the revision 2.0 Parcel 22 RFI report. Overall delays at Parcel 22 are mostly attributed to the document review times. Due to these aforementioned delays and contracting limitations, the Army will require acquisition of a new contract to complete the revisions.

The May 10, 2018 disapproval letter from NMED requires a phase 2 RFI Work Plan submittal by February 15, 2019. In an email dated October 23, 2018 between NMED (Ben Wear) and the Permittee (represented by Mark Patterson), the Army requested to delay submittal of a phase 2 RFI work plan until the RFI Report Revision 3.0 is accepted. In the same email chain NMED suggested that both documents be extended to the August 12, 2019 date requested for the revision 3.0. Several of the NMED comments require additional soil sampling for characterization, soil removal actions and asbestos inspections. Comment number 33 is requesting explanation of field work plans for the digital geophysical MEC investigation previously conducted, which is planned under a separate MEC RFI work plan. This would be a substantial addition to the Revision 3.0 RFI Report. Comment four, nine and fifteen require further explanations in the RFI Report Revision 3.0 or otherwise additional sampling in the phase 2 RFI field activities. Due to requirements to implement these comments, the Army requests that the phase 2 RFI Work Plan be extended until August 12, 2019 to coincide with the delivery of the RFI Report Revision 3.0.



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The Army is seeking extension in time under RCRA Permit Section I.M. due to additional time needed to prepare the document.

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

Sincerely,

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Mark Patterson  
BRAC Environmental Coordinator

CF:

Mr. Dave Cobrain, NMED HWB  
Mr. Ben Wear, NMED HWB  
Mr. Michiya Suzuki, NMED HWB  
Mr. Chuck Hendrickson, USEPA  
Mr. Ian Thomas, US Army BRACD  
Mr. Michael Falcone, USACE, Fort Worth  
Mr. Steve Smith, USACE, Fort Worth  
Ms. Daisy Pate, USACE  
Dr. Cheryl Montgomery, ERDC  
Mr. Clayton Seoutewa, BIA Zuni  
Ms. Sharlene Begay-Platero, Navajo Nation IDR  
Ms. George Padilla, BIA/NRO/DECSM  
Dr. B.J Howerton, BIA  
Ms. Eugenia Quintana, Navajo EPA  
Mr. Mark Harrington, Pueblo of Zuni  
Ms. Jennifer Turner, DOI  
FWDA Admin Record, Ohio / NM