



State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous Waste Bureau



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BUTCH TONGATE
Cabinet Secretary
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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

September 26, 2018

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 IGLOO INTERIOR WORK PLAN
PARCEL 4, AOC 29, IGLOO BLOCK C
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-18-002**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *Final Igloo Interior Work Plan Parcel 4, AOC 29, Igloo Block C* (Work Plan), dated July 13, 2018. The Permittee has indicated that the document review fee for this Work Plan will not be submitted, but did not appeal the fee assessment in accordance with 20.4.1.302 NMAC. NMED has reviewed the Work Plan and will provide comments to the Permittee once the document review fee has been received. NMED provides the following preliminary comments to notify the U.S. Army (Army) of major deficiencies in the Work Plan. If the Work Plan is corrected to address the following comments, it is still unlikely that the resulting modified Work Plan will adequately address all deficiencies in the Work Plan. AOC 29 is listed on the Fort Wingate Depot Activity RCRA Permit and documents reviewed by NMED are subject to the Hazardous Waste Permit and Corrective Action Fees included in 20.4.2 NMAC. NMED will provide a full set of detailed comments upon receipt of the document review fees assessed in accordance with 20.4.2.201.B(2) NMAC.

COMMENTS

1. NMED is concerned that the proposed activities in the Plan will not result in an outcome that aligns with the U.S. Department of Interior requirements for transferring facility property to the Navajo Nation and the Pueblo of Zuni.
2. Analyses of vacuumed dust characterize what has been removed from the igloos but provide no information on residual contamination left behind on walls and floors. No confirmatory wipe sampling is proposed.
3. The referenced wipe sample screening levels are outdated and must be revised.
4. The Plan ignores the primary route of exposure, ingestion, as well as dermal contact.
5. Historical data gaps identified by the Agency for Toxic Substances and Disease Registry (ATSDR) were ignored.
6. Data from previous igloo sampling efforts exhibit data quality issues related to inappropriate sampling methods and can only be utilized for screening purposes. Utilization of this data for risk assessment calculations is not appropriate.
7. ATSDR also commented that children under 4-years old should be included as receptor. This was not addressed in the Work Plan.
8. Inaccurate and/or unsupported risk calculations are presented in the Work Plan.
9. The chemicals of potential concern (COPCs) list is incomplete.

Based on a preliminary review, implementation of the Work Plan without revision will not generate acceptable data to assess the risks related to the igloos. The issues identified above, as well as other deficiencies, will be discussed in detail once the document review fee has been paid.

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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

cc: D. Cobrain, NMED HWB
B. Wear, NMED HWB
M. Suzuki, NMED HWB
C. Hendrickson, U.S. EPA Region 6
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File: FWDA 2018 and Reading, Igloos, FWDA-18-002