



**DEPARTMENT OF THE ARMY**  
FORT WINGATE DEPOT ACTIVITY  
P.O. BOX 268  
FORT WINGATE, NM 87316

December 11, 2008

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

**RE: Class 1 Permit Modification request to remove Parcels 4B, 5B, and 8 from the RCRA Permit**

Dear Mr. Bearzi:

The purpose of this letter is to request a Class 1 RCRA Permit modification without prior notification to the Fort Wingate Depot Activity (FWDA) RCRA Permit EPA ID No. NM6213820974 (Permit). The requested modification is to remove parcels 4B, 5B, and 8 from Table VII.2 of the Permit. Please note parcels 4 and 5 were split into parcels 4A, 4B, 5A, and 5B as shown on the map in Attachment 2 of the Permit. The Army is not proposing the removal of parcels 4A and 5A at this time. The Permit Attachment 2 map was recently revised to reflect the proposed boundary change showing parcels 4B, 5B, and 8 as 'pending transfer'. The map was submitted with the Parcel 25 Permit modification request. Parcels 4B, 5B, and 8 compose part of the former explosive safety buffer area between the igloos and the western boundary. Parcels 4B, 5B, and 8 contain approximately 168, 70, and 432 acres respectively.

In accordance with the Permit, the Army researched the historical information on these parcels including aerial photographs. Additionally, the Army interviewed former employees on their knowledge of the depot. The interviews were recorded in a report titled *FWDA Summary of Interviews* dated February 20, 2007 which was submitted to the NMED and stakeholders. The interviewees did not recall any activities occurring on these parcels. Since these parcels were "buffer" areas for explosive safety around the igloos, no permanent structures were installed. Thus, very little activity occurred in these parcels. Army personnel detected faint images of roads leading to square patches of land on the 1948 aerial photograph however. These images were not on the previous 1935 aerial and grew fainter on photographs after 1948. This information triggered the Army to investigate these parcels in 2007. The enclosed compact disc contains the report of findings entitled *Report of Investigation for Potential Environmental Areas of Concern, FWDA* dated October 2007.

In this report the Army determined the square patches were small areas of land (open storage areas) graded flat in order to temporarily store excess ammunition being return from World War II. The report details the minimal historical information, investigative methods, and sampling results. It has a figure showing sample locations on the west side of the depot. Parcel 4B contained sites T1 and T2. Parcel 5B contained sites T3 and T4. Parcel 8 contained sites T5 - T16 and T19 - T31. Each site in parcels 4B, 5B, and 8 were tested for explosives using a multi-incremental sample from 30 sub-samples from a depth of 0-6" below the surface. Also, each site was visually inspected

by Mr. David Holladay, a Tech 3 Army Ordnance and Explosives Safety Specialist. He also surveyed each site with a Schoenstedt metal detector. No explosives or munitions were detected.

During the field inspection of the open storage sites, the Army discovered a crescent shaped berm approximately eight feet high and 30 feet long in Parcel 8. See the maps on the enclosed compact disc. The Army rechecked our records and found a drawing (enclosed) dated 1956 for a proposed small arms range. The drawing confirmed the location of the berm and can also be found on the enclosed compact disc and the FWDA website at <https://team.ftwingate.org/Login.asp>. It has a filename of "Small\_Arms\_Trace\_Range.pdf". Mr. Holladay inspected the site visually and with a Schoenstedt metal detector and found no bullets. The Army also obtained a multi-incremental sample from 30 sub-samples from a depth of 0-6" below the surface. The sample was tested for lead and explosives (even though small arms rounds do not contain explosives). No explosives were detected. Lead was detected at only 4.8 mg/kg. Test results are found in Table 1 on the enclosed compact disc. The Army concludes this berm was not used.

The Army determined through use of GIS Parcels 4B, 5B, and 8 did not contain any pre-1940 magazines shown on the 1935 aerial photo and the FWDA Permit Attachment 2 map. No other structures, munitions, or releases of hazardous constituents were identified on the three parcels. The Army inspected the western fence and BLM survey markers and found the fence line runs within two feet of the survey markers in each parcel. The only exception is where the southern most 300 feet (approximately) of western fence line diverts 150 feet away from the boundary into FWDA in a southeast direction in the southwest corner of parcel 4B. See the Site Location map on the compact disc. This 150 foot discrepancy exists at the parcel 2 boundary and continues diverging from the boundary line down to parcel 3.

The Army recently investigated nearby AOC-78/82 in parcels 4A, 5A, and 6 under the Release Assessment which is presently under review by the Tribes. The Army contractor will forward the results of this investigation to the NMED in January 2009 as an addendum to the report previously submitted to the Tribes. Area of Concern 78/82 consisted of former munitions storage sites. Please see the site map. The AOC was investigated using geophysics. No munitions or munitions related debris was found at the AOC. The west patrol road divides parcels 4A and 5A from 4B and 5B which are topographically upgrade of AOC-78/82. The Army concludes parcels 4B, 5B, and 8 have not been impacted by AOC-78/82.

Based on the above investigation, interviews, and research the Army believes no release of hazardous constituents has occurred in these three parcels. The Tribes agreed to a 60 day concurrent (Tribal) review of this document with the NMED. The Army is requesting the removal of Parcels 4B, 5B, and 8 from the Permit via a Class 1 Permit modification because there are no Areas of Concern or Solid Waste Management Units in these parcels.

If you have questions or require further information, please call me at (330) 358-7312.

Sincerely,



Mark Patterson  
BRAC Environmental Coordinator

## Enclosures

### CF:

Dave Cobrain, NMED, HWB  
Tammy Diaz, NMED, HWB  
Richard Cruz, Fort Wingate  
Mark Patterson, Fort Wingate  
Chuck Hendrickson, U.S. EPA Region 6  
Sharlene Begay-Platero, Navajo Nation  
Eugenia Quintana, Navajo EPA  
Rose Duwyenie, Navajo BIA  
Steve Beran, Zuni Environmental  
Edward Wemytewa, Pueblo of Zuni  
Valerie Lahalla, Pueblo of Zuni  
Clayton Seoutewa, SW BIA  
Charles Long, Navajo Council  
Ben Burshia, BIA  
Ron Walker, BIA  
Bill O'Donnell, ACSIM  
Ira May, USAEC

### MEDIA

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