

Army Draft

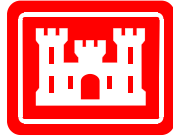
**HWMU Removal Report
HWMU, Parcel 3**

**Fort Wingate Depot Activity
McKinley County, New Mexico**

February 18, 2016

**Contract No. W912QR-04-D-0025
Delivery Order No. DM01**

Prepared for:



U.S. Department of the Army
Corps of Engineers –

Albuquerque District
4101 Jefferson Plaza NE
Albuquerque, New Mexico 87109

Fort Worth District
819 Taylor Street
Fort Worth, Texas 76102

Prepared by:



12120 Shamrock Plaza, Suite 300
Omaha, Nebraska 68154

16170613



Field Change Request (FCR) Form

FCR No.:	FWDA FCR 2011-001
PROJECT:	Long Term Maintenance of Arroyo Exiting OB/OD Unit, Fort Wingate Depot Activity
PROJECT NUMBER:	16170613
APPLICABLE DOCUMENT:	Long Term Maintenance of Arroyo Exiting OB/OD Unit Fort Wingate Depot Activity (FWDA) McKinley County, NM
DESCRIPTION OF CHANGE:	Change page 20, paragraph 2.19.2 from: "The MGF D for unintentional detonations for the FWDA is the 105mm projectile, M1." TO READ "The MGF D for unintentional detonations for the FWDA is the 40mm MK2 projectile."
REASON FOR CHANGE:	The 40mm MK2 is listed in the amended ESS (page 4, paragraph 3.1, lines 9 & 10.) as the MGF D for the Arroyo MRS.
RECOMMENDED RESOLUTION:	Implement described change above.
PRESENT AND COMPLETED WORK IMPACT:	There is no impact upon the outcome of the completion of the work; however, this change will reconcile discrepancies between directives.

Prepared By:

K. A. Montgomery, URS SUXOS

29 Aug 2011

Date

Approvals:

Daniel Kur URS, UXOQC

30 Aug 2011

Date



John Carson, URS, PM

30 Aug 2011
Date

Andreas Kothleitner, URS, MRP QC Mgr

30 Aug 2011
Date

Mac Reed, URS, MRP Safety Manager

30 Aug 2011
Date

USACE PM

31 Aug 2011
Date

Not Required
Regulatory Agent Rep (If Required)

Date



Field Change Request (FCR) Form

FCR No.:	FWDA FCR 2011-002
PROJECT:	Long Term Maintenance of Arroyo Exiting OB/OD Unit, Fort Wingate Depot Activity
PROJECT NUMBER:	16170613
APPLICABLE DOCUMENT:	Long Term Maintenance of Arroyo Exiting OB/OD Unit Fort Wingate Depot Activity (FWDA) McKinley County, NM
DESCRIPTION OF CHANGE:	Change page 6, paragraph 2.5.1 from: "Establish a standard 200-foot by 200-foot grid system for the MEC removal area;" and on page 17, paragraph 2.1.6.1 "The contractor will establish a 100-foot by 100-foot grid system for the MRS using a handheld Global Positioning System (GPS)." TO READ "The contractor will establish a grid system by taking a start point using a handheld Global Positioning System (GPS) within the arroyo just east of the 209 gate, then take a point at the end of the sweep each day. The perimeter of the area swept that day will be recorded by using a track log."
REASON FOR CHANGE:	It is not efficient or effective to survey and conduct the MEC surface removal action of 100-foot by 100-foot or 200-foot by 200-foot grid systems as the shape of the arroyo is very inconsistent with drastic changes in width.
RECOMMENDED RESOLUTION:	Implement described change above.
PRESENT AND COMPLETED WORK IMPACT:	Present references listed give two different grid sizes, neither of which are practical for the work to be performed. The recommend change will eliminate conflicting grid sizes. No impact to completed work as this feature of work has not started.



Prepared By: 29 Aug 2011
K. A. Montgomery, URS SUXOS Date

Approvals: 30 Aug 2011
Daniel Kur URS, UXOQC Date

30 Aug 2011
John Carson, URS, PM Date

30 Aug 2011
Andreas Kothleitner, URS, MRP QC Mgr Date

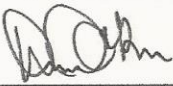

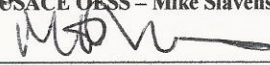

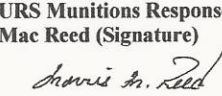
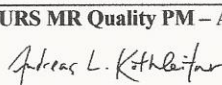
30 Aug 2011
Mac Reed, URS, MRP Safety Manager Date

13 Sept 2011
USACE PM Date

Not Required
Regulatory Agent Rep (If Required) Date



URS CORPORATION FIELD CHANGE REQUEST (FCR)

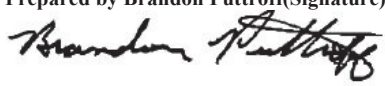

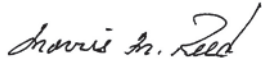


CONTRACT TASK ORDER NAME: W912QR-04-D-0025	CTO # DM01	CHANGE REQUEST NO. 2013-001
TO: John Carson, URS Project Manager	LOCATION: Fort Wingate Depot Activity, McKinley County, New Mexico	DATE: 04-10-13
1. DESCRIPTION: Revision of Paragraph 4.3.2 of the SSHP (Attachment 3 to the APP) Change current sentence wording from: "Each site vehicle will be equipped with at least one portable fire extinguisher rated 20 pound-BC." To the revised sentence wording: "Each site vehicle will be equipped with at least one portable fire extinguisher rated 5 pound-BC."		
2. REASON FOR CHANGE To be consistent with the requirements of EM 385-1-1 for site vehicles.		
3. RECOMMENDED DISPOSITION (Submit sketch, if applicable): Minor Change <input checked="" type="checkbox"/> Major Change (Impacts Cost, Schedule) <input type="checkbox"/>		
4. DISPOSITION: (Approval Required by USACE) <input type="checkbox"/> Not Approved (give reason). <input checked="" type="checkbox"/> Considered minor change – APPROVED per recommended disposition – Documents will not be formally revised. Field office to maintain as –built records. <input type="checkbox"/> Considered major change – Client approval required via contract modification process		
Prepared by: Fort Wingate URS UXOSO – Dan Kur (Signature) 	Date: 04-16-13	
USACE Project Manager – Eric Kirwan (Signature) 	Date: 4-17-13	
USACE OESS – Mike Slavens (Signature) 	Date: 4/17/13	
URS Project Manager - John Carson (Signature) 	Date: 4-17-2013	
URS Munitions Response Safety Program Manager (URS MR SPM) – Mac Reed (Signature) 	Date: 4-17-2013	
URS MR Quality PM – Andreas Kothleitner (Signature) 	Date: 4-17-2013	

URS CORPORATION FIELD CHANGE REQUEST (FCR)

CONTRACT TASK ORDER NAME: W912QR-04-D-0025	CTO # DM01	CHANGE REQUEST NO. 2013-002
TO: John Carson, URS Project Manager	LOCATION: Fort Wingate Depot Activity, McKinley County, New Mexico	DATE: 04/19/2013
1. DESCRIPTION (items involved, submit sketch, if applicable): Revise text in Section 3.5, Paragraph 2, Sentence 2: "The HWMU will be divided into 200-foot-by-200-foot 100-foot-by-100-foot grids. Figure 3-7 grid spacing changed from 200-foot-by-200 foot to 100-foot-by-100 foot.		
2. REASON FOR CHANGE The modification references the New Mexico Environmental Department (NMED) review comment dated August 16, 2012: In the revised Section 3.16.1, Confirmation Soil Sampling Method, the Permittee states, "The remainder of the site will be divided into grids approximately 150 feet by 150 feet and a composite sample will be collected from within each grid." The grid size for the remainder of the site must be no larger than 100 feet by 100 feet. This grid spacing will approximate a quarter acre and provide 4 composite samples per acre. Submit replacement pages for text and figures to correct this issue.		
3. RECOMMENDED DISPOSITION (Submit sketch, if applicable): Minor Change <input checked="" type="checkbox"/> Major Change (Impacts Cost, Schedule) <input type="checkbox"/>		
4. DISPOSITION: (Approval Required by USACE) <input type="checkbox"/> Not Approved (give reason). <input type="checkbox"/> Considered minor change – APPROVED per recommended disposition – Documents will not be formally revised. Field office to maintain as –built records. <input type="checkbox"/> Considered major change – Client approval required via contract modification process		
Prepared by: Fort Wingate URS Geo – Darrell Hall (Signature) 		Date: 04/19/2013
USACE Project Manager – Eric Kirwan (Signature) 		Date: 1 May 2013
URS Project Manager – John Carson (Signature) 		Date: 4/26/2013
URS Munitions Response Safety Program Manager (URS MR SPM) – Mac Reed (Signature) 		Date: 1 May 2013
URS MR Quality PM – Andreas Kothleitner (Signature) 		Date: 1 May 2013





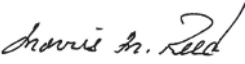
URS CORPORATION FIELD CHANGE REQUEST (FCR)

CONTRACT TASK ORDER NAME: W912QR-04-D-0025	CTO # DM01	CHANGE REQUEST NO. 2013-003
TO: John Carson, URS Project Manager	LOCATION: Fort Wingate Depot Activity, McKinley County, New Mexico	DATE: 06/3/2013
1. DESCRIPTION (items involved, submit sketch, if applicable): Change Section 3.10.3 (line 30, 5 th paragraph) to read, " Test coupons Thermocouples hooked to a data logger will be placed in the center of the initial loads to verify the optimal load weight and that the target load temperatures is are reached. Once it has been demonstrated that the target temperature is being reached, monthly operational tests performance verifications will be completed to verify performance, using thermocouples hooked to a data logger test coupons."		
Change Table 4-1, Thermal Treatment of MD to read, "Thermal Treatment Flashing of MDAS categorized as MD; following thermal treatment flashing of MD; Verify the monthly operational test results using colorimetric agents thermocouples with a data logger; Three phase control to include a final random sampling inspection of thermally flashed treated MD (UXOQCS); After batches of MD have been thermally flashed treated during the monthly operational test; Verify thermally treated flashed MD passes the colorimetric test has achieved target temperature of 650 degrees F for 10 minutes		
2. REASON FOR CHANGE: The use of a thermocouple in conjunction with a data logger will provide a project record of the time and temperature data for the flashing operations for the duration of the project.		
3. RECOMMENDED DISPOSITION (Submit sketch, if applicable): <div style="text-align: center;"> <input checked="" type="checkbox"/> Minor Change <input type="checkbox"/> Major Change (Impacts Cost, Schedule) </div>		
4. DISPOSITION: (Approval Required by Client Representative) <div style="text-align: center;"> <input type="checkbox"/> Not Approved (give reason). <input type="checkbox"/> Considered minor change – APPROVED per recommended disposition – Documents will not be formally revised. Field office to maintain as –built records. <input type="checkbox"/> Considered major change – Client approval required via contract modification process </div>		
Prepared by Brandon Puttroff(Signature) 		Date: 6/4/2013
USACE Project Manager – Eric Kirwan (Signature) KIRWAN.STEPHEN.E.1048589649 <small>Digitally signed by KIRWAN.STEPHEN.E.1048589649 DN: c=US, o=U.S. Government, ou=DoD, ou=PKI, ou=USA, cn=KIRWAN.STEPHEN.E.1048589649 Date: 2013.06.14 08:15:04 -04'00'</small>		Date: 6/14/13
URS Project Manager – John Carson(Signature) 		Date: 6/13/13
URS UXO Safety Manager – Morris Reed(Signature) 		Date: 6/13/2013
URS UXO Quality Manager – Andreas Kothleitner(Signature) 		Date: 6/13/2013
URS SUXOS – Bob Florence(Signature) 		Date: 6/13/2013
URS UXOQCS – Randy Burrington(Signature)		Date: 6/13/2013

<i>Randy L. Bennett</i>		
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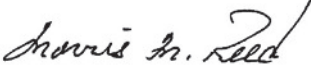



URS GROUP, INC. FIELD CHANGE REQUEST (FCR)

CONTRACT TASK ORDER NAME: W912QR-04-0025	CTO # DM01	CHANGE REQUEST NO. 2013-004
TO: John Carson, URS Project Manager	LOCATION: Fort Wingate Depot Activity, McKinley County, NM	DATE: 10-10-13
RE: _____ Drawing # _____ Title: _____ _____ Specific Sections: _____ Title: _____ <input checked="" type="checkbox"/> Other: Table 6-1 Emergency Information _____		
1. DESCRIPTION (items involved, submit sketch, if applicable): Revision to Table 6-1 Emergency Information: Change URS Regional Health and Safety Manager from: Dennis Day To: Tony Indorato Office: 757.321.1262 Cell: 757.298.1563		
2. REASON FOR CHANGE Personnel Change.		
3. RECOMMENDED DISPOSITION (Submit sketch, if applicable): <input checked="" type="checkbox"/> Minor Change _____ Major Change (Impacts Cost, Schedule)		
4. DISPOSITION: (Approval Required by Client Representative) _____ Not Approved (give reason). <input checked="" type="checkbox"/> Considered minor change – APPROVED per recommended disposition – Documents will not be formally revised. Field office to maintain as –built records. _____ Considered major change – Client approval required via contract modification process		
Prepared by (Signature) Fort Wingate URS UXOSO-Daniel Kur 	Date: 10-10-13	
Client Project Manager KIRWAN.STEPHEN.E.1048589649 <small>Digitally signed by KIRWAN.STEPHEN.E.1048589649 DN: cn=URS, ou=US Government, ou=DoD, ou=PM, ou=USA, serial=KIRWAN.STEPHEN.E.1048589649 Date: 2013.10.18 13:56:44 -0400</small>	Date: 18 October 2013	
URS Project Manager (Signature) 	Date: 10-18-13	
URS UXO Safety Manager (Signature) 	Date: 10-18-13	

URS CORPORATION FIELD CHANGE REQUEST (FCR)

CONTRACT TASK ORDER NAME: W912QR-04-D-0025	CTO # DM01	CHANGE REQUEST NO. FWDA FCR 2013-005
TO: John Carson, URS Project Manager	LOCATION: Fort Wingate Depot Activity, McKinley County, New Mexico	DATE: 23 October 2013
<p>1. DESCRIPTION: Revision of WP Section 3, Excavation Method, paragraph 3.7.2, lines 24-27.</p> <p>WP Section 3, paragraph 3.7.2, lines 24-27 currently states: “The armored operator station will be constructed in the bed of a heavy duty pick-up truck to allow the clearest line of sight and visibility to the excavator and the excavation face, as well as providing greater mobility during the course of the excavation activities.”</p> <p>Change this Section to read: “If an unarmored mobile operator station is used to conduct the remote control excavation inside the HWMU, it must meet all of the following MSD requirements ;</p> <ol style="list-style-type: none"> 1. Be beyond the HFD of 450 feet from any armored rock truck transporting material (low input operation) based on the 155mm projectile from 2. Be beyond the MFD of 592 feet from the hammer-mill (high input operation) based on the BLU-3, and; 3. Be beyond the MFD of 592 feet from remote control excavation point (high input operation) on the BLU-3 		
<p>2. REASON FOR CHANGE: Addresses the required MSDs based on the approved DDESB ESS for the operation of an unarmored mobile operator station.</p>		
<p>3. RECOMMENDED DISPOSITION (Submit sketch, if applicable):</p> <p>Minor Change <input checked="" type="checkbox"/> Major Change (Impacts Cost, Schedule) <input type="checkbox"/></p>		
<p>4. DISPOSITION: (Approval Required by USACE)</p> <p><input type="checkbox"/> Not Approved (give reason).</p> <p><input type="checkbox"/> Considered minor change – APPROVED per recommended disposition – Documents will not be formally revised. Field office to maintain as –built records.</p> <p><input type="checkbox"/> Considered major change – Client approval required via contract modification process</p>		
<p>Prepared by: Fort Wingate URS UXOQCS – Randy Burrington (Signature) </p>		<p>Date: 23 October 2013</p>
<p>USACE Project Manager – Eric Kirwan (Signature) KIRWAN.STEPHEN.E .1048589649</p> <p><small>Digitally signed by KIRWAN.STEPHEN.E.1048589649 DN: c=US, o=U.S. Government, ou=DoD, ou=PKI, ou=USA, cn=KIRWAN.STEPHEN.E.1048589649 Date: 2013.10.30 10:15:18 -04'00'</small></p>		<p>Date:</p>
<p>USACE OESS – Tim Bohannon (Signature) BOHANNON.TIMOTHY .PATRICK.1203953760</p> <p><small>Digitally signed by BOHANNON.TIMOTHY.PATRICK.1203953760 DN: c=US, o=U.S. Government, ou=DoD, ou=PKI, ou=USA, cn=BOHANNON.TIMOTHY.PATRICK.1203953760 Date: 2013.10.30 08:10:09 -06'00'</small></p>		<p>Date:</p>
<p>URS Project Manager - John Carson (Signature) </p>		<p>Date: 28 October 2013</p>
<p>URS Munitions Response Safety Program Manager (URS MR SPM) – Mac Reed (Signature)</p>		<p>Date: 28 October 2013</p>

	
<p>URS MR Quality PM – Andreas Kothleitner (Signature)</p> 	<p>Date: 28 October 2013</p>



URS CORPORATION FIELD CHANGE REQUEST (FCR)

CONTRACT TASK ORDER NAME: W912QR-04-D-0025	CTO # DM01	CHANGE REQUEST NO. FWDA FCR 2013-006
TO: John Carson, URS Project Manager	LOCATION: Fort Wingate Depot Activity, McKinley County, New Mexico	DATE: 23 October 2013
<p>1. DESCRIPTION: Revision of WP Section 3, Excavation Method, paragraph 3.7.2, lines 34-36.</p> <p>WP Section 3, paragraph 3.7.2, lines 34-36 currently states: "Excavation operations will generally be completed working from upstream to downstream (south to north) of the arroyo to prevent re-contamination of the areas where excavation work has been performed."</p> <p>Change this Section to read: "Excavation operations will be performed in a manner to prevent re-contamination of the areas where previous excavation work has been performed."</p>		
<p>2. REASON FOR CHANGE: Deletes requirement to work south-to-north and retains requirement to prevent re-contamination of worked areas.</p>		
<p>3. RECOMMENDED DISPOSITION (Submit sketch, if applicable):</p> <p>Minor Change <input checked="" type="checkbox"/> Major Change (Impacts Cost, Schedule) <input type="checkbox"/></p>		
<p>4. DISPOSITION: (Approval Required by USACE)</p> <p><input type="checkbox"/> Not Approved (give reason).</p> <p><input type="checkbox"/> Considered minor change – APPROVED per recommended disposition – Documents will not be formally revised. Field office to maintain as –built records.</p> <p><input type="checkbox"/> Considered major change – Client approval required via contract modification process</p>		
<p>Prepared by: Fort Wingate URS UXOQCS – Randy Burrington (Signature) </p>		<p>Date: 23 October 2013</p>
<p>USACE Project Manager – Eric Kirwan (Signature) KIRWAN.STEPHEN.E Digitally signed by KIRWAN.STEPHEN.E.1048589649 DN: c=US, o=U.S. Government, ou=DoD, ou=PKI, ou=USA, cn=KIRWAN.STEPHEN.E.1048589649 Date: 2013.10.30 10:16:36 -04'00' 1048589649</p>		<p>Date:</p>
<p>USACE OESS – Tim Bohannon (Signature) BOHANNON.TIMOTHY. Digitally signed by BOHANNON.TIMOTHY.PATRICK.1203953760 DN: c=US, o=U.S. Government, ou=DoD, ou=PKI, ou=USA, cn=BOHANNON.TIMOTHY.PATRICK.1203953760 Date: 2013.10.30 08:09:39 -06'00' PATRICK.1203953760</p>		<p>Date:</p>
<p>URS Project Manager - John Carson (Signature) </p>		<p>Date: 28 October 2013</p>
<p>URS Munitions Response Safety Program Manager (URS MR SPM) – Mac Reed (Signature) </p>		<p>Date: 28 October 2013</p>
<p>URS MR Quality PM – Andreas Kothleitner (Signature) </p>		<p>Date: 28 October 2013</p>

URS CORPORATION FIELD CHANGE REQUEST (FCR)

CONTRACT TASK ORDER NAME: W912QR-04-D-0025	CTO # DM01	CHANGE REQUEST NO. FWDA FCR 2013-007
TO: John Carson, URS Project Manager	LOCATION: Fort Wingate Depot Activity, McKinley County, New Mexico	DATE: 23 October 2013
<p>1. DESCRIPTION: Revision of WP Section 3, Initial Overhead Magnet and Inspection Line, paragraph 3.8.2, lines 33-36.</p> <p>WP Section 3, paragraph 3.8.2, lines 33-36 currently reads: "MEC items determined unacceptable to move by the inspection-line UXOSO and Supervisor will be diverted to the MEC detention area and fed onto a bed of sand by a separate transfer chute. This area is an ECO block structure configured to conduct BIP operations as described in Section 3.13."</p> <p>Change this Section to read: "MEC items determined unacceptable to move by the inspection-line UXOSO and Supervisor will be diverted to the MEC detention area and fed into a sand-filled tub or bin by a separate transfer chute. Prior to the MEC item being diverted, the inspection-line UXOSO shall ensure the eddy current equipment operator is positioned outside of the K24 or K18 (with proper hearing protection) overpressure distance. Using the onsite remote control or armored equipment the tub containing the MEC item will be moved away from the sifting plant equipment as appropriate to conduct MEC disposal operations within the HWMU."</p>		
<p>2. REASON FOR CHANGE: Ensures eddy current equipment operator safety and negates potential damage to screening plant equipment during MEC disposal operations of BIP items.</p>		
<p>3. RECOMMENDED DISPOSITION (Submit sketch, if applicable):</p> <p style="text-align: center;">Minor Change <input checked="" type="checkbox"/> Major Change (Impacts Cost, Schedule) <input type="checkbox"/></p>		
<p>4. DISPOSITION: (Approval Required by USACE)</p> <p><input type="checkbox"/> Not Approved (give reason).</p> <p><input type="checkbox"/> Considered minor change – APPROVED per recommended disposition – Documents will not be formally revised. Field office to maintain as –built records.</p> <p><input type="checkbox"/> Considered major change – Client approval required via contract modification process</p>		
<p>Prepared by: Fort Wingate URS UXOQCS – Randy Burrington (Signature) </p>	<p>Date: 23 October 2013</p>	
<p>USACE Project Manager – Eric Kirwan (Signature) KIRWAN.STEPHEN.E.1048589649 <small>Digitally signed by KIRWAN.STEPHEN.E.1048589649 DN: c=US, o=US Government, ou=DoD, ou=PEL, ou=USA, ou=KIRWAN.STEPHEN.E.1048589649 Date: 2013.11.12 13:04:32 -0700</small></p>	<p>Date:</p>	
<p>USACE OESS – Tim Bohannon (Signature) BOHANNON.TIMOTHY.PATRICK.120339 <small>Digitally signed by BOHANNON.TIMOTHY.PATRICK.120339 DN: c=US, o=US Government, ou=DoD, ou=PEL, ou=USA, ou=BOHANNON.TIMOTHY.PATRICK.120339780 Date: 2013.11.07 12:36:16 -0700</small></p>	<p>Date:</p>	
<p>URS Project Manager - John Carson (Signature) </p>	<p>Date: 30 October 2013</p>	
<p>URS Munitions Response Safety Program Manager (URS MR SPM) – Mac Reed (Signature) </p>	<p>Date: 30 October 2013</p>	

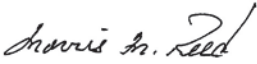
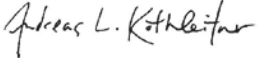
<p>URS MR Quality PM – Andreas Kothleitner (Signature)</p> 	<p>Date: 30 October 2013</p>
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URS CORPORATION FIELD CHANGE REQUEST (FCR)


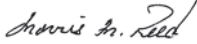
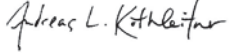
CONTRACT TASK ORDER NAME: W912QR-04-D-0025	CTO # DM01	CHANGE REQUEST NO. FWDA FCR 2013-008
TO: John Carson, URS Project Manager	LOCATION: Fort Wingate Depot Activity, McKinley County, New Mexico	DATE: 23 October 2013
<p>1. DESCRIPTION: Revision of WP Section 3, Eddy Current Non-Ferrous Metal Removal, paragraph 3.8.7, lines 29-34.</p> <p>WP Section 3, paragraph 3.8.7, lines 29-34 currently reads: “The entire contents of the non-ferrous waste collected from the eddy-current process will be transported to the CAMU and burned in accordance with the SOP No. 14 (Appendix I) and NMED Air Quality Bureau requirements. The material will undergo a post-burn inspection to verify the completeness of the disposal process. An MPPEH inspection will be completed on the post-burn residues as described in Section 3.11. Ash generated from the burn will be containerized for disposal in accordance with its waste profile.”</p> <p>Change this Section to read: “The non-ferrous material collected at the eddy current separator will be subjected to the MPPEH inspection process as described in Section 3.11 of the WP Discovered MEC will either be transported to an ECM for storage or to the CAMU for disposal. The remaining non-ferrous material determined to be MDAS will be thermally flashed at the Thermal Flashing Unit as described in Section 3.10.3 and secured until transferred off site for final disposition.</p>		
<p>2. REASON FOR CHANGE: To implement an MPPEH inspection process for non-ferrous material collected at the eddy current separator. Also adds clarification how discovered MEC at the eddy current separator will be managed.</p>		
<p>3. RECOMMENDED DISPOSITION (Submit sketch, if applicable):</p> <p>Minor Change <input checked="" type="checkbox"/> Major Change (Impacts Cost, Schedule) _____</p>		
<p>4. DISPOSITION: (Approval Required by USACE)</p> <p>_____ Not Approved (give reason).</p> <p>_____ Considered minor change – APPROVED per recommended disposition – Documents will not be formally revised. Field office to maintain as –built records.</p> <p>_____ Considered major change – Client approval required via contract modification process</p>		
<p>Prepared by: Fort Wingate URS UXOQCS – Randy Burrington (Signature) </p>		<p>Date: 25 October 2013</p>
<p>USACE Project Manager – Eric Kirwan (Signature) KIRWAN.STEPHEN.E.1 048589649</p> <p><small>Digitally signed by KIRWAN.STEPHEN.E.1048589649 DN: c=US, o=U.S. Government, ou=DoD, ou=PKI, ou=USA, cn=KIRWAN.STEPHEN.E.1048589649 Date: 2013.10.30 10:17:19 -04'00'</small></p>		<p>Date:</p>
<p>USACE OESS – Tim Bohannon (Signature) BOHANNON.TIMOTHY.PATRICK.1203953760 .PATRICK.1203953760</p> <p><small>Digitally signed by BOHANNON.TIMOTHY.PATRICK.1203953760 DN: c=US, o=U.S. Government, ou=DoD, ou=PKI, ou=USA, cn=BOHANNON.TIMOTHY.PATRICK.1203953760 Date: 2013.10.30 08:08:57 -06'00'</small></p>		<p>Date:</p>
<p>URS Project Manager - John Carson (Signature) </p>		<p>Date: 28 October 2013</p>



URS Munitions Response Safety Program Manager (URS MR SPM) – Mac Reed (Signature) 	Date: 28 October 2013
URS MR Quality PM – Andreas Kothleitner (Signature) 	Date: 28 October 2013

URS GROUP, INC. FIELD CHANGE REQUEST (FCR)

CONTRACT TASK ORDER NAME: W912QR-04-D-0025	CTO # DM01	CHANGE REQUEST NO. 2014-001
TO: John Carson, URS Project Manager	LOCATION: Fort Wingate Depot Activity, McKinley County, New Mexico	DATE: 04 Feb 2014
1. DESCRIPTION: Revision of WP Section 3, paragraph 3.9.1 Stockpile Sampling Method: WP Section 3, paragraph 3.9.1, lines 20-24 currently reads: "One composite sample will be collected from 10 subsample locations within each 250-cubic yard stockpile. Five subsample locations will be collected from the first 125 cubic yards of material deposited from the conveyor and five subsamples will be collected from the second 125 cubic yards deposited from the conveyor. The subsamples will be collected one to two feet below the surface of the stockpile." Change WP Section 3, paragraph 3.9.1, lines 20-24 to read: "One composite sample will be collected from 10 subsample locations from within each 250-cubic yard stockpile. The subsamples will be collected from various heights and depths throughout the stockpile to obtain a sample representative of the entire stockpile."		
2. REASON FOR CHANGE: Plant and excavation operations must stop during sample collection. Frequent cycles of plant stoppage and startup creates additional safety concerns with personnel exposed to moving parts, motors, belts etc. Additionally, further safety concerns arise when personnel are exposed when outside of protective shielding to collect samples. Collecting the samples from the stockpiles all at one time, at the end of the work day, will reduce the occurrence of safety issues associated with plant startup and exposure of personnel without shielding.		
3. RECOMMENDED DISPOSITION (Submit sketch, if applicable): <input checked="" type="checkbox"/> Minor Change <input type="checkbox"/> Major Change (Impacts Cost, Schedule)		
4. DISPOSITION: (Approval Required by USACE) <input type="checkbox"/> Not Approved (give reason). <input checked="" type="checkbox"/> Considered minor change – APPROVED per recommended disposition – Documents will not be formally revised. Field office to maintain as –built records. Email from NMED is included below. Change will be documented in report. <input type="checkbox"/> Considered major change – Client approval required via contract modification process		
Prepared by: Fort Wingate URS SUXOS – Randy Burrington (Signature)		Date: 4 Feb 2014
USACE Project Manager – Eric Kirwan (Signature) KIRWAN.STEPHENE.1048589649 <small>Digitally signed by KIRWAN.STEPHENE.1048589649 DN: cn=US, o=U.S. Government, ou=DoD, ou=PRC, ou=USA, cn=KIRWAN.STEPHENE.1048589649 TMN=20140221102450-0200</small>		Date:
USACE OESS – DJ Meyer (Signature)		Date:

URS Project Manager - John Carson (Signature) 	Date: 10 Feb 2014
URS Munitions Response Safety Program Manager (URS MR SPM) – Mac Reed (Signature) 	Date: 10 Feb 2014
URS MR Quality PM – Andreas Kothleitner (Signature) 	Date: 10 Feb 2014

Eric,

NMED's intent was not to create stoppages or delays in operations through this requirement. The intent of the requirement is to ensure that composite samples are representative of the entire 250 cubic yards of soils within the stockpile and does not indicate when the sampling should take place.

The requirement in the work plan intends to avoid the situation where a sampler might collect all 10 samples from near the surface of the stockpile because of ease of access and lessened time requirements. NMED's intent is to ensure that the samples are collected from various lateral and vertical locations throughout the stockpile. The stated "one to two feet below the surface" should be considered a minimum requirement considering the size of the stockpiles, i.e., sample depths of four to five feet below the surface may be required based on the stockpile geometry. The approach utilized to accomplish this requirement should be documented in the final report.


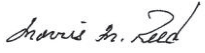

Please let me know if you need anything further.

Thank you,

Ben Wear
Environmental Scientist
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Dr. East, Bldg. 1
Santa Fe, NM 87505
(505) 476-6041



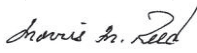

URS GROUP, INC. FIELD CHANGE REQUEST (FCR)

CONTRACT TASK ORDER NAME: W912QR-04-D-0025	CTO # DM01	CHANGE REQUEST NO. 2014-002
TO: John Carson, URS Project Manager	LOCATION: Fort Wingate Depot Activity, McKinley County, New Mexico	DATE: 07 Feb 2014
1. DESCRIPTION: Revision of WP Section 3, paragraph 3.8.3 Triple Deck Screen: WP Section 3, paragraph 3.8.3, lines 8-10 currently reads: "The top "reliever" screen will be a 3-inch square metal mesh designed to trap large material and protect the bottom screen." Change WP Section 3, paragraph 3.8.3, lines 8-10 to read: "The top "reliever" screen will be a combination 1 ½ -inch square metal mesh and custom fabricated punch plate screen with 11-inch by 15-inch openings designed to trap large or elongated material and protect the bottom screen." Revision of WP Section 3, paragraph 3.8.7 Eddy Current Non-Ferrous Metal Removal WP Section 3, paragraph 3.8.7, lines 22-24 currently reads: "The individual stockpiles from the radial stacker will be loaded into feeder hoppers that will transport the material to the eddy current non-ferrous metal separator." Change WP Section 3, paragraph 3.8.7, lines 22-24 to read: "The individual stockpiles from the radial stacker will be loaded into a soil shredder and then fed into feeder hoppers that will transport the material to the eddy current non-ferrous metal separator."		
2. REASON FOR CHANGE: To improve the efficiency of the screening plant and increase operating time. Incorporating the additional screen will remove long slender rocks from the process and reduce the likelihood of clogging the hammer mill. The soil shredder will break up soils with a high clay fraction that can clog the eddy current feed hopper, increasing operating time.		
3. RECOMMENDED DISPOSITION (Submit sketch, if applicable): <input checked="" type="checkbox"/> Minor Change <input type="checkbox"/> Major Change (Impacts Cost, Schedule)		
4. DISPOSITION: (Approval Required by USACE) <input type="checkbox"/> Not Approved (give reason). <input type="checkbox"/> Considered minor change – APPROVED per recommended disposition – Documents will not be formally revised. Field office to maintain as –built records. <input type="checkbox"/> Considered major change – Client approval required via contract modification process		
Prepared by: Fort Wingate URS SUXOS – Randy Burrington (Signature)		Date: 7 Feb 2014
USACE Project Manager – Eric Kirwan (Signature) KIRWAN.STEPHEN.E.1048589649 <small>Digitally signed by KIRWAN.STEPHEN.E.1048589649 DN: cn=US, o=U.S. Government, ou=DOD, ou=PR, ou=USA, cn=KIRWAN.STEPHEN.E.1048589649 Date: 2014.02.11 09:54:09 -0500</small>		Date:

USACE OESS – DJ Myers (Signature) MYERS.DENNIS.J.1010877330 <small>Digitally signed by MYERS.DENNIS.J.1010877330 DN: cn=US, o=U.S. Government, ou=DoD, ou=PM, ou=USA, cn=MYERS.DENNIS.J.1010877330 Date: 2014.02.11 07:33:23 -0700</small>	Date:
URS Project Manager - John Carson (Signature) 	Date: 10 Feb 2014
URS Munitions Response Safety Program Manager (URS MR SPM) – Mac Reed (Signature) 	Date: 10 Feb 2014
URS MR Quality PM – Andreas Kothleitner (Signature) 	Date: 10 Feb 2014



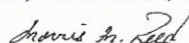
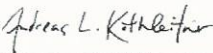
URS GROUP, INC. FIELD CHANGE REQUEST (FCR)

CONTRACT TASK ORDER NAME: W912QR-04-D-0025	CTO # DM01	CHANGE REQUEST NO. 2014-003
TO: John Carson, URS Project Manager	LOCATION: Fort Wingate Depot Activity, McKinley County, New Mexico	DATE: 010 Feb 2014
<p>1. DESCRIPTION: Revision of WP Section 3, paragraph 3.10.3 Flashing Process:</p> <p>WP Section 3, paragraph 3.10.3, lines 24-27 currently reads: “The furnace will be controlled with automatic thermostatic modulation for achieving the target load temperature. The cycle time will be approximately 1 hour, which provides for achieving the target temperature, a soak time of 10 minutes at 650° F, and cool down period. A data logger will record time of operation and operating temperature.”</p> <p>Change WP Section 3, paragraph 3.10.3, lines 24-27 to read: “The furnace will be controlled with automatic thermostatic modulation for achieving the target load temperature and operating time. Thermocouples mounted within each basket will read temperatures within the basket during each cycle. The modulation will initiate the furnace startup cycle, continue to operate the furnace until the temperature within the baskets have reached 650° F for 10 minutes and then initiate the cool down cycle. A data logger will record time of operation and temperature within the baskets for each cycle.</p> <p>WP Section 3, paragraph 3.10.3, lines 31-33 currently reads: “Test coupons will be placed in the initial loads to verify that target load temperature is reached. Once it has been demonstrated that target temperature is being reached, monthly performance verifications will be completed, using test coupons.”</p> <p>Delete WP Section 3, paragraph 3.10.3, lines 31-33.</p> <p>As a result of the above changes, Table 4-1, Definable Features of Work and QC Actions, Thermal Treatment of MD will be revised with the following:</p> <p>Under “Attribute” replace the current text with “Verify the cycle achieved required batch temperature and time”</p> <p>Under “QC Action” replace the current text with “Periodic review of TFU operating data (UXOQCS)”</p> <p>Under “Frequency” replace the current text with “Minimum of two times/month”</p> <p>Under “Acceptance Criteria” replace the current text with “Flashed batch reached required cycle temperature and time”</p>		
<p>2. REASON FOR CHANGE:</p> <p>To improve the quality control and efficiency of the TFU. The automatic thermostatic modulation will adjust the cycle time as necessary so the TFU reaches the target basket temperature for ten minutes. The modifications will electronically record data to document that every cycle of the TFU reaches the target basket temperature for ten minutes.</p>		
<p>3. RECOMMENDED DISPOSITION (Submit sketch, if applicable):</p> <p><input checked="" type="checkbox"/> Minor Change <input type="checkbox"/> Major Change (Impacts Cost, Schedule)</p>		

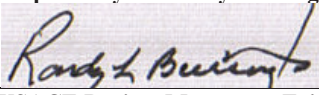
4. DISPOSITION: (Approval Required by USACE) <input type="checkbox"/> Not Approved (give reason). <input type="checkbox"/> Considered minor change – APPROVED per recommended disposition – Documents will not be formally revised. Field office to maintain as –built records. <input type="checkbox"/> Considered major change – Client approval required via contract modification process	
Prepared by: – John Carson (Signature) 	Date: 10 Feb 2014
USACE Project Manager – Eric Kirwan (Signature) KIRWAN.STEPHEN.E.1048589649 <small>Digitally signed by KIRWAN.STEPHEN.E.1048589649 DN: c=US, ou=U.S. Government, ou=DoD, ou=PKI, ou=USA, cn=KIRWAN.STEPHEN.E.1048589649 Date: 2014.02.13 13:38:05 -0500</small>	Date:
USACE OESS – DJ Myers (Signature) MYERS.DENNIS.J.1010877330 <small>Digitally signed by MYERS.DENNIS.J.1010877330 DN: c=US, ou=U.S. Government, ou=DoD, ou=PKI, ou=USA, cn=MYERS.DENNIS.J.1010877330 Date: 2014.02.13 11:35:07 -0700</small>	Date:
URS Project Manager - John Carson (Signature) 	Date: 10 Feb 2014
URS Munitions Response Safety Program Manager (URS MR SPM) – Mac Reed (Signature) 	Date: 10 Feb 2014
URS MR Quality PM – Andreas Kothleitner (Signature) 	Date: 10 Feb 2014


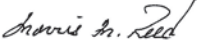
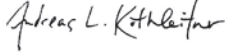
URS GROUP, INC. FIELD CHANGE REQUEST (FCR)

CONTRACT TASK ORDER NAME: W912QR-04-D-0025	CTO # DM01	CHANGE REQUEST NO. 2014-004
TO: John Carson, URS Project Manager	LOCATION: Fort Wingate Depot Activity, McKinley County, New Mexico	DATE: 20 Mar 2014
1. DESCRIPTION: Revision of APP Section 12.25 Night Operations Lighting Plan: APP Section 12.25 currently reads: "Not Applicable." Revise APP Section 12.25 to read: "Night work is planned for the loading of stockpiled material into the Eddy Current plant. While night work is in progress, the stockpile, eddy current unit, conveyors and first aid station will be illuminated, in accordance with Table 7-1 of EM 385-1-1. No pedestrians will be in the night work loading area during the operation of the heavy equipment. The heavy equipment will have forward and rear lights. Heavy equipment operations will be monitored by the loader operator, UXOSO, and UXO Tech both visually and via remote control cameras. Workers will review and follow the attached Activity Hazard Analysis titled, Loading the Eddy Current Hopper During Night Hours and conduct a Daily Tailgate Safety Meeting." Revision of Attachment A of SSHP to include an Activity Hazard Analysis for Night Work – attached. Development of a Night Operations Lighting Plan – attached.		
2. REASON FOR CHANGE: The primary plant will process about 650 cy of material per day. The eddy current plant will process 400 cy of material per day. Operating a second shift will allow the eddy current plant to keep up with the primary plant and complete the work on schedule.		
3. RECOMMENDED DISPOSITION (Submit sketch, if applicable): <input checked="" type="checkbox"/> Minor Change <input type="checkbox"/> Major Change (Impacts Cost, Schedule)		
4. DISPOSITION: (Approval Required by USACE) <input type="checkbox"/> Not Approved (give reason). <input checked="" type="checkbox"/> Considered minor change – APPROVED per recommended disposition – Documents will not be formally revised. Field office to maintain as –built records. <input type="checkbox"/> Considered major change – Client approval required via contract modification process		
Prepared by: – Randy Burrington (Signature) 		Date: 28 Mar 2014
USACE Project Manager – Eric Kirwan (Signature) <small>Digitally signed by KIRWANSTEPHEN.E.1048589649 DN: c=US, o=U.S. Government, ou=DoD, ou=PKL, ou=USA, cn=KIRWANSTEPHEN.E.1048589649 Date: 2014.04.04 15:30:21 -0400</small>		Date:

USACE OESS – DJ Myers (Signature) MYERS.DENNIS.J.1010877330 <small>Digitally signed by MYERS.DENNIS.J.1010877330 DN: c=US, o=U.S. Government, ou=DoD, ou=PKI, ou=USA, cn=MYERS.DENNIS.J.1010877330 Date: 2014.04.04 13:24:42 -0500</small>	Date:
URS Project Manager - John Carson (Signature) 	Date: 28 Mar 2014
URS Biologist – Jean Paul Charpentier (Signature) 	Date: 1 Apr 2014
URS Munitions Response Safety Program Manager (URS MR SPM) – Mac Reed (Signature) 	Date: 28 Mar 2014
URS MR Quality PM – Andreas Kothleitner (Signature) 	Date: 28 Mar 2014

URS GROUP, INC. FIELD CHANGE REQUEST (FCR)

CONTRACT TASK ORDER NAME: W912QR-04-D-0025	CTO # DM01	CHANGE REQUEST NO. 2014-005
TO: John Carson, URS Project Manager	LOCATION: Fort Wingate Depot Activity, McKinley County, New Mexico	DATE: 27 Mar 2014
1. DESCRIPTION: Revision of SWPPP Section 4.2 Structural Practices: SWPPP Section 4.2, 6 th Bullet currently reads: "Covering each stockpile until it is characterized." Revise SWPPP Section 4.2, delete 6th Bullet. Revision of WP Section 6.2, Mitigation Procedures: WP Section 6.2, Mitigation Procedures 17 th bullet (page 6-9, line 10) currently reads: "Non-hazardous stockpiled soils will be covered and hazardous soils will be placed on liner and covered or placed in a lined roll-off until disposal." Revise WP Section 6.2, Mitigation Procedures 17th bullet (page 6-9, line 10) to read: "Hazardous soils will be placed on a liner and covered or placed in a lined roll-off until disposal."		
2. REASON FOR CHANGE: The existing language may imply to some readers that stockpiles must be covered. The intent of the section is to provide optional structural practices that may be implemented should existing protective measures not provide the needed protection. The language is revised to reflect the intent.		
3. RECOMMENDED DISPOSITION (Submit sketch, if applicable): <input checked="" type="checkbox"/> Minor Change <input type="checkbox"/> Major Change (Impacts Cost, Schedule)		
4. DISPOSITION: (Approval Required by USACE) <input type="checkbox"/> Not Approved (give reason). <input type="checkbox"/> Considered minor change – APPROVED per recommended disposition – Documents will not be formally revised. Field office to maintain as –built records. <input type="checkbox"/> Considered major change – Client approval required via contract modification process		
Prepared by: – Randy Burrington (Signature) 		Date: 27 Mar 2014
USACE Project Manager – Eric Kirwan (Signature) KIRWAN.STEPHEN.E.1048589649 <small>Digitally signed by KIRWAN.STEPHEN.E.1048589649 DN: cn=US, o=US Government, ou=DoD, ou=PA, ou=USA, c=US, email=KIRWAN.STEPHEN.E.1048589649 Date: 2014.03.27 16:45:10 -0400</small>		Date:
USACE SWPPP Representative – Mike Scoville (Signature) SCOVILLE.MICHAEL.G.1231021988 <small>Digitally signed by SCOVILLE.MICHAEL.G.1231021988 DN: cn=US, o=US Government, ou=DoD, ou=PA, ou=USA, c=US, email=SCOVILLE.MICHAEL.G.1231021988 Date: 2014.03.27 15:41:54 -0500</small>		Date: 27 Mar 2014

URS Project Manager - John Carson (Signature) 	Date: 27 Mar 2014
URS Munitions Response Safety Program Manager (URS MR SPM) – Mac Reed (Signature) 	Date: 27 Mar 2014
URS MR Quality PM – Andreas Kothleitner (Signature) 	Date: 27 Mar 2014

Memorandum

URS GROUP, INC. FIELD CHANGE REQUEST (FCR) Biological Review

CONTRACT TASK ORDER NAME: W912QR-04-D-0025	CTO # DM01	CHANGE REQUEST NO. 2014-004
TO: John Carson, URS Project Manager	LOCATION: Fort Wingate Depot Activity, McKinley County, New Mexico	DATE: 4 April 2014

Introduction

This technical memorandum evaluates the proposed changes to the Night Operations Lighting Plan to determine whether it is likely to affect wildlife species including those species that are listed or proposed for listing under the Endangered Species Act (ESA).

Description

Revision of APP Section 12.25 Night Operations Lighting Plan:

APP Section 12.25 currently reads: "Not Applicable."

Revise APP Section 12.25 to read: "Night work is planned for the loading of stockpiled material into the Eddy Current plant. While night work is in progress, the stockpile, eddy current unit, conveyors and first aid station will be illuminated, in accordance with Table 7-1 of EM 385-1-1.

No pedestrians will be in the night work loading area during the operation of the heavy equipment. The heavy equipment will have forward and rear lights. Heavy equipment operations will be monitored by the loader operator, UXOSO, and UXO Tech both visually and via remote control cameras.

Workers will review and follow the attached Activity Hazard Analysis titled, Loading the Eddy Current Hopper During Night Hours and conduct a Daily Tailgate Safety Meeting."

Project Location

Fort Wingate Depot Activity (FWDA) is located in northwestern New Mexico in McKinley County, approximately 8 miles east of Gallup, New Mexico. FWDA currently occupies approximately 24 square miles (15,273 acres) of land with facilities formerly used to operate a reserve storage facility providing for the care, preservation, and minor maintenance of assigned commodities—primarily conventional military munitions.

Species Evaluation

Information concerning general wildlife, endangered and threatened species, or critical habitat that may occur in the project area was obtained from the USFWS New Mexico Ecological Services Field Office website for McKinley County, New Mexico (USFWS 2014). According to the USFWS online database, four federal listed threatened, endangered or proposed species have the potential to occur in McKinley County.

Table 1. Species Listed by U.S. Fish and Wildlife Service for McKinley County, New Mexico

Common Name	Scientific Name	Status	Critical Habitat
Mexican spotted owl	<i>Strix occidentalis lucida</i>	Threatened	Yes
Southwestern willow flycatcher	<i>Empidonax traillii eximus</i>	Endangered	No
Yellow-billed cuckoo	<i>Coccyzus americanus</i>	Proposed Threatened	No
Zuni bluehead sucker	<i>Catostomus discobolus</i>	Proposed Endangered	No

SOURCE: U.S. Fish and Wildlife Service 2014

At night, the work area is illuminated with lights mounted to the machinery and aimed toward the project area surface. About half the light is reflected and half is absorbed by the dark surfaces of the project area. Rather than shining directly into wildlife habitat, project lights would produce a visible glare and skyglow outside of active project areas. At the time of this analysis, no data were available regarding the specifications on lights used at the project site.

Under conditions that greatly change the natural light levels in wildlife habitat, it's possible that wildlife could respond by changing normal behaviors as has been observed in other bird species. A study of the effects of light pollution on song bird behavior indicated that artificial light in an urban environment had substantial effects on the timing of reproductive behavior and on individual mating patterns (Kempnaers et al. 2010). Also, rodents could change activity patterns under the influence of artificial night lighting. Observations of many rodent species indicate that individuals reduce activity or stay under canopy cover to reduce predation risks in response to higher ambient light (Rich and Longcore 2006), but predators may be more successful at catching prey under higher ambient light (Stone et al. 2009).

Although night work would illuminate wildlife habitat, the potential amount of light coming from the project areas would not be enough to affect the natural behaviors of wildlife. Furthermore, the terrain would shade most wildlife habitat from any project-sourced light. Also, the upper tree canopy likely would further block light and reduce the possible impact from night illumination. Therefore, proposed night illumination would have no effect on wildlife or federal listed species. Because no designated critical habitat occurs in the affected area, the proposed action would have no effect on critical habitat.

References

Kempnaers, B., P. Borgstrom, P. Loes, E. Schlicht and M. Valcu. 2010. Artificial night lighting affects dawn song, extra-pair siring success, and lay date in songbirds. *Current Biology* 20: 1735-1739.

Rich, C. and T. Longcore. 2006. *Ecological consequences of artificial night lighting*. Island Press, Washington, D.C.

Stone, E.L., G. Jones and S. Harris. 2009. Street lighting disturbs commuting bats. *Current Biology* 19: 1123-1127.

U.S. Fish and Wildlife Service (USFWS). 2014. Species list, McKinley County, New Mexico. U.S Fish and Wildlife Service, New Mexico Ecological Services website.

Prepared By:

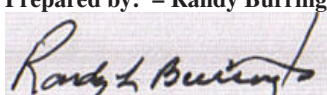

Jean Paul (JP) Charpentier

Senior Biologist/Environmental Planner


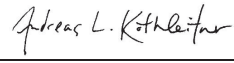
A handwritten signature in blue ink that reads "Jean Paul Charpentier". The signature is written in a cursive style and is positioned below the printed name and title.



URS GROUP, INC. FIELD CHANGE REQUEST (FCR)

CONTRACT TASK ORDER NAME: W912QR-04-D-0025	CTO # DM01	CHANGE REQUEST NO. 2014-007
TO: John Carson, URS Project Manager	LOCATION: Fort Wingate Depot Activity, McKinley County, New Mexico	DATE: 15 Apr 2014
<p>1. DESCRIPTION: Revision of Work Plan Section 3.10.2 Staging and Segregation of MD:</p> <p>WP Section 13.10.2 currently reads: "MD generated from the screening process, that has been certified as MDAS as described in Section 3.11, will be flashed. MD awaiting flashing will be kept..."</p> <p>Revise WP Section 13.10.2 to read: "MD generated from the screening process, that has been certified as MDAS as described in Section 3.11, will be flashed. MD recovered from the polishing magnet is small, dense material and will not be flashed. The MD recovered from the polishing magnet will undergo the MPPEH inspection process as described in Section 3.11, containerized separately from other MD, and sent offsite to a smelter for destruction."</p> <p>Attached letter describes the process for documentation and custody for transport and destruction of the MD recovered the polishing magnet.</p>		
<p>2. REASON FOR CHANGE:</p> <p>The material from the polishing magnet is very small, dense, and not conducive to flashing. The language provides flexibility in handling this material while meeting project objectives.</p>		
<p>3. RECOMMENDED DISPOSITION (Submit sketch, if applicable):</p> <p><input checked="" type="checkbox"/> Minor Change <input type="checkbox"/> Major Change (Impacts Cost, Schedule)</p>		
<p>4. DISPOSITION: (Approval Required by USACE)</p> <p><input type="checkbox"/> Not Approved (give reason).</p> <p><input checked="" type="checkbox"/> Considered minor change – APPROVED per recommended disposition – Documents will not be formally revised. Field office to maintain as –built records.</p> <p><input type="checkbox"/> Considered major change – Client approval required via contract modification process</p>		
<p>Prepared by: – Randy Burrington (Signature)</p> 		Date: 15 Apr 2014
<p>USACE Project Manager – Eric Kirwan (Signature)</p> <p><small>KIRWAN.STEPHEN.E.104858964 Digitally signed by KIRWAN.STEPHEN.E.104858964 DN: c=US, o=U.S. Government, ou=DoD, ou=PKI, ou=USA, cn=KIRWAN.STEPHEN.E.104858964 Date: 2014.04.21 09:46:49 -0400</small></p>		Date:
<p>USACE OESS – Dennis (DJ) Myers (Signature)</p> <p><small>MYERS.DENNIS.J.1010877330 Digitally signed by MYERS.DENNIS.J.1010877330 DN: c=US, o=U.S. Government, ou=DoD, ou=PKI, ou=USA, cn=MYERS.DENNIS.J.1010877330 Date: 2014.04.17 09:34:48 -06'00'</small></p>		Date:
<p>URS Project Manager - John Carson (Signature)</p> 		Date: 15 Apr 2014



URS Munitions Response Safety Program Manager (URS MR SPM) – Mac Reed (Signature) 	Date: 15 Apr 2014
URS MR Quality PM – Andreas Kothleitner (Signature) 	Date: 15 Apr 2014



April 15, 2014

Stephen Kirwan
United States Army Corps of Engineers, Fort Worth District
819 Taylor Street
Fort Worth, Texas 76102

**Re: HANDLING PROCEDURES FOR MATERIAL RECOVERED FROM
POLISHING MAGNET
HAZARDOUS WASTE MANAGEMENT UNIT REMOVAL ACTION
FORT WINGATE DEPOT ACTIVITY, NEW MEXICO.**

Dear Mr. Kirwan,

The purpose of this letter is to notify the Army of our procedures for handling the material recovered from the polishing magnet. This material is ferrous metal smaller than 5/8 inch that is recovered from the last magnet prior to being subjected to the eddy current operation. This material is very dense and not conducive to flashing. In order to safely handle this material and meet the project objectives, URS plans to handle this material in the following manner:

- The material will undergo an MPPEH inspection as described in Section 3.11 of the Work Plan.
- The material will be placed in a locked and sealed container separately from flashed material.
- The material will be shipped to a smelter for destruction. A Form 1348 and a chain of custody will accompany each shipment.
- The material will not be comingled with other material at the smelter.
- A certificate of destruction will be provided by the smelter.

Please notify me if any additional information is required.

Sincerely,

URS GROUP, INC.

John Carson, PE
Project Manager

URS Group, Inc.
12120 Shamrock Plaza,
Omaha, NE 68154
Tel: 402.334.8181
Fax: 402.334.1984
www.urs.com



KIRWAN.STEPHEN
.E.1048589649

Digitally signed by
KIRWAN.STEPHEN.E.1048589649
DN: c=ES, ou=U.S. Government, ou=DnD, ou=PKI,
ou=USA, cn=KIRWAN.STEPHEN.E.1048589649
Date: 2014.04.17 16:41:24 -0400

Stephen Kirwan
USACE Project Manager

Concur / ~~Non Concur~~

SMITH.JACKIE.G.11
21737430

Digitally signed by SMITH.JACKIE.G.1121737430
DN: c=US, ou=U.S. Government, ou=DnD, ou=PKI,
ou=USA, cn=SMITH.JACKIE.G.1121737430
Date: 2014.04.17 15:49:29 -0500

Jackie Smith
USACE Lead OESS

Concur / ~~Non Concur~~


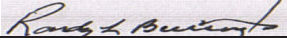
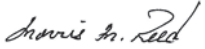

Mark Patterson
BRAC Environmental Coordinator

Concur / Non Concur

URS Group, Inc.
12120 Shamrock Plaza,
Omaha, NE 68154
Tel: 402.334.8181
Fax: 402.334.1984
www.urs.com

URS GROUP, INC. FIELD CHANGE REQUEST (FCR)

CONTRACT TASK ORDER NAME: W912QR-04-D-0025	CTO # DM01	CHANGE REQUEST NO. 2014-008
TO: URS Project Team	LOCATION: Fort Wingate Depot Activity, McKinley County, New Mexico	DATE: 03 June 2014
<p>1. DESCRIPTION: Revision of Night Operations Lighting Plan Technical Memorandum Section 3.0 Lighting. The first paragraph of the section states:</p> <p>“Portable light towers may be utilized throughout the work area to meet or exceed the lighting requirements for the above identified areas. Portable light towers will be placed within the work areas in position so as to provide the required lighting for each area. The towers and their placement will be tested by operating all lighting towers during a period of low or no light. A portable light meter will be utilized to verify that the requisite lighting is being achieved in each area. If the lighting in any area is insufficient then the light towers will be readjusted or moved and each area will be retested. If necessary, light towers will be added. Each area will be retested monthly to verify and document that the required lighting is being met.”</p> <p>Revise Night Operations Lighting Plan Technical Memorandum first paragraph to read:</p> <p>“Portable light towers, permanent lighting, or a combination thereof will be used throughout the work area to meet or exceed the lighting requirements for the above identified areas. Portable or pole-mounted lighting will be placed within the work areas in position so as to provide the required lighting for each area. A portable light meter will be utilized to verify that the requisite lighting is being achieved in area. If the lighting is insufficient then then the lights will readjusted or moved and the area will be retested. If necessary, additional lights will be installed. The areas will be retested monthly to verify and document that the required lighting is being met.”</p>		
<p>2. REASON FOR CHANGE: Changing portable lighting to permanent pole-mounted lighting, but maintain flexibility of using portable lighting if necessary.</p>		
<p>3. RECOMMENDED DISPOSITION (Submit sketch, if applicable):</p> <p><input checked="" type="checkbox"/> Minor Change <input type="checkbox"/> Major Change (Impacts Cost, Schedule)</p>		
<p>4. DISPOSITION: (Approval Required by USACE)</p> <p><input type="checkbox"/> Not Approved (give reason).</p> <p><input checked="" type="checkbox"/> Considered minor change – APPROVED per recommended disposition – Documents will not be formally revised. Field office to maintain as –built records.</p> <p><input type="checkbox"/> Considered major change – Client approval required via contract modification process</p>		
Prepared by: – John Carson (Signature) 		Date: 3 June 2014
USACE Project Manager – Eric Kirwan (Signature) <small>Digitally signed by KIRWAN.STEPHEN.E.1048589649 DN: c=US, o=U.S. Government, ou=DoD, ou=PKI, ou=USA, cn=KIRWAN.STEPHEN.E.1048589649 Date: 2014.06.09 12:48:18 -04'00'</small> KIRWAN.STEPHEN.E.1048589649		Date:

USACE OESS – DJ Myers (Signature) MYERS.DENNIS.J.1010877330 <small>Digitally signed by MYERS.DENNIS.J.1010877330 DN: c=US, o=U.S. Government, ou=DoD, ou=PKI, ou=USA, cn=MYERS.DENNIS.J.1010877330 Date: 2014.06.09 10:07:31 -0600</small>	Date:
URS Project Manager - John Carson (Signature) 	Date: 3 June 2014
URS Senior Unexploded Ordnance Supervisor – Randy Burrington (Signature) 	Date: 3 June 2014
URS Munitions Response Safety Program Manager (URS MR SPM) – Mac Reed (Signature) 	Date: 3 June 2014
URS MR Quality PM – Andreas Kothleitner (Signature) 	Date: 3 June 2014



URS Corporation 12120 Shamrock Plaza, Suite 300 Omaha, NE 68154	Project Name: FWDA Work Plan and Removal
	Project Location: Fort Wingate, Gallup, NM
	NCR No.: 001
Project No.: 16170613	MRS: CAMU Grid: N/A
Contract#: W912QR-04-D-0025	Date: 9/11/2013

NONCONFORMANCE AND CORRECTIVE ACTION REPORT

Part I (UXOQC)

Description of Nonconforming Condition⁽¹⁾:

On 8/9/2013 and 9/6/2013 MEC disposal operations were conducted without constructing a "demolition pit" in accordance with FWDA RCRA Permit No. NM6213820974.

Apparent Quality Requirement Not Complied With⁽²⁾:

Section 3.13 of the HWMU Removal Work Plan, specifically, the CAMU will be constructed and operated in accordance with FWDA RCRA Permit No. NM6213820974. Excerpts from the Permit describing a demolition pit are:
 ATTACHMENT 1, GENERAL FACILITY DESCRIPTION, CAMU DESCRIPTION - ...Each demolition pit consists of a 15-foot by 15-foot area surrounded on three sides by a containment berm and is excavated to a depth of four feet below ground surface.
 ATTACHMENT 14, CAMU WASTE ANALYSIS PLAN, Table 1: CAMU General Unit and Waste Description, Open Detonation - Each demolition pit will occupy a 15-foot by 15-foot area and have a depth of 4 feet below ground surface. The interior surface of the demolitions pits will be composed of dirt.

Signature: Andreas L. Kothleitner
 Andreas Kothleitner, MR QPM 9/11/2103
 (UXOQC) (Date)

Corrective Action Due Date: Next MEC Disposal

Severity Level: 3

Copy Delivered to: SUXOS PM GEO Ops MRP QCM GEO QC MRP Safety Mgr

Signature: Robert L. Jarman Signature: John Carson
 (SUXOS) (Date) (PM) (Date)

Part II OPERATIONS (Responsible Process Manager)

Recommended Corrective Actions ⁽³⁾ :	Resurvey: <input type="checkbox"/>	Reacquire: <input type="checkbox"/>	Other: <input checked="" type="checkbox"/>
	Reprocess: <input type="checkbox"/>	Re-clear: <input type="checkbox"/>	

Complete all future MEC disposal shots within a pit at least 4 feet deep. Back fill the pit after each demolition is complete.

Root Cause Analysis (only for Security Level 1)⁽⁴⁾:

Signature: Robert L. Jarman
 (SUXOS) (Date)

Signature: John Carson 9/12/2013
 (PM) (Date)

Part III CORRECTIVE ACTION VERIFICATION, SUXOS, PM, UXOQC

Corrective Action Completed: _____ (Date) ⁽⁵⁾ Signature: Robert L. Jarman (SUXOS)

⁽⁵⁾ Signature: John Carson (PM)

Corrective Action Verified _____ ⁽⁵⁾ Signature: _____ (UXOQCS)

On: _____
_____ (Date) _____

URS Corporation 12120 Shamrock Plaza, Suite 300 Omaha, NE 68154		Project Name: FWDA Work Plan and Removal	
		Project Location: Fort Wingate, Gallu,p NM	
		NCR No.: 001	
Project No.:	16170613	MRS: CAMU	Grid: N/A
Contract#:	W912QR-04-D-0025	Date:	9/11/2013

UXOQCS Comments ⁽⁶⁾:
UXOQCS will verify that all future MEC disposal operations are conducted within a 4-foot excavated pit that is backfilled upon completion of the operation.

- Approved
- Disapproved

New NCR
Number: _____

Signature: Andreas L. Kothleitner (UXOQC)

Note: When all actions have been completed a copy of this form shall be forwarded to project document control as part of the project records

Date:
MRS:
Grid:
Item:

URS Corporation 12120 Shamrock Plaza, Suite 300 Omaha, NE 68154	Project Name: FWDA Removal Action
	Project Location: Fort Wingate, Gallup, NM
	NCR No.: 2014-001
Project No.: 16170613	MRS: HWMU Grid: N/A
Contract#: W912QR-04-D-0025	Date: 10 June 2014

NONCONFORMANCE AND CORRECTIVE ACTION REPORT

Part I (UXOQC)

Description of Nonconforming Condition⁽¹⁾:

On 7 June 14, a portion of Stockpile #53, a portion of Stockpile #54, and all of Stockpile #51, (sampling results have indicated that stockpile 53 is contaminated above residential SSLs and stockpile 54 has potential human health risks associated with additive effects) were moved and placed on top of "Below Residential SSLs Stockpile" pile. As such, the segregation of different types of stockpile soils, after sampling results were received, was improperly managed.

Apparent Quality Requirement Not Complied With⁽²⁾:

Section 3.9 of the HWMU WP, Stockpile Management and Characterization Sampling.

Specifically, "The purpose of the stockpile sampling is to identify and segregate those processed stockpiles that have constituents that meet the cleanup criteria stipulated in Attachment 7 of the RCRA Permit from those that do not."

Signature:



Greg Wilson

(UXOQC)

10 June 2014

(Date)

Corrective Action Due Date:

10 June 2014

Severity Level:

3

Copy Delivered to:

- SUXOS PM MRP QCM MRP Safety Manager

Signature:



18 June 2014

(SUXOS)

(Date)

Signature:



18 June 2014

(PM)

(Date)

Part II OPERATIONS (Responsible Process Manager)

Recommended Corrective Actions⁽³⁾:	Resurvey: <input type="checkbox"/>	Reacquire: <input type="checkbox"/>	Other: <input type="checkbox"/>
	Reprocess: <input type="checkbox"/>	Re-clear: <input checked="" type="checkbox"/>	

Stockpiles 51, 53, and 54 were placed in the "Below Residential SSLs Stockpile", but were placed in a manner where they could readily be moved back to the AOC. The piles were excavated to grade and hauled to the AOC. Additional soil was removed beneath where the piles had been placed and the area was sampled to verify that all contaminated soils were removed.

Soil samples P3HWMU-SKPL-RSSL-01 and P3HWMU-SKPL-RSSL-02 were collected 17 June 2014. The affected portion of the "Below Residential SSLs Stockpile" remains off limits until soil sample results are received and reviewed.

The results were received on 24 June and upon review it was determined that there is no soils contaminated above Residential SSLs remaining in the "Below Residential SSLs Stockpile".

Conducted additional training for all personnel involved with soils handling. The training emphasized communication and individual protocols and responsibilities prior to moving and individual stockpile. Implemented a working "Soil Stockpile Tracking Sheet" (example attached in table on last page). This will be completed by the loader/driver as stockpiles are placed in the AOC or moved following analysis to any other appropriate stockpile location.

Root Cause Analysis (only for Severity Level 1) ⁽⁴⁾:

Signature:

N/A
(SUXOS) (Date)

Signature:

N/A
(PM) (Date)

Part III CORRECTIVE ACTION VERIFICATION , SUXOS, PM, UXOQC

Corrective Action

Completed:

18 June 2014
(Date)

⁽⁵⁾ Signature:

 (SUXOS)

⁽⁵⁾ Signature:

 (PM)

Corrective Action Verified

On:

01 July 2014
(Date)

⁽⁵⁾ Signature:

 (UXOQCS)

URS Corporation 12120 Shamrock Plaza, Suite 300 Omaha, NE 68154		Project Name: Fort Wingate Removal Action Project Location: Fort Wingate, Gallup, NM NCR No.: 001
Project No.: 16170613	MRS: HWMU	Grid: N/A
Contract#: W912QR-04-D-0025	Date: 10 June 2014	

UXOQCS Comments ⁽⁶⁾:

Approved
New NCR

Disapproved
Number: _____
Signature: _____
(UXOQC)

Note: When all actions have been completed a copy of this form shall be forwarded to project document control as part of the project records

Date:
MRS:
Grid:
Item:





The next five photos show the results of removing the contaminated soil piles.



The area was kept cordoned off pending soil analysis results.



Soil sample areas. High winds blew the delineators down.



PSHWMU rockpiles
SOIL STOCKPILE TRACKING SHEET

Stockpile Identification Number	Grid #	Date Started	Sample Identification Number	Date Sampled	Analytical Results Pass/Fail	Moved to (Haz Waste, Clean Backfill, Contaminated Residential SCLs)	Date Soil Moved
SKPL-0061	14	6/14/14	PSHWMU-SKPL-0061	9 June 14			
SKPL-0062	12	5 June	PSHWMU-SKPL-0062	11 June 14			
SKPL-0063	20	5 June	PSHWMU-SKPL-0063	11 June 14			
SKPL-0064	26	9 June	PSHWMU-SKPL-0064	11 June 14			
SKPL-0065	24	13 June	PSHWMU-SKPL-0065	16 June 14			
SKPL-0066	23	13 June	PSHWMU-SKPL-0066	16 June 14			
SKPL-0067	11	13 June	PSHWMU-SKPL-0067	16 June 14			
SKPL-0068	10	16 June	PSHWMU-SKPL-0068	19 June 14			
SKPL-0069	9	17 June	PSHWMU-SKPL-0069	19 June 14			
SKPL-0070	8	17 June	PSHWMU-SKPL-0070	19 June 14			
SKPL-0071			PSHWMU-SKPL-0071				
SKPL-0072			PSHWMU-SKPL-0072				
SKPL-0073			PSHWMU-SKPL-0073				
SKPL-0074			PSHWMU-SKPL-0074				
SKPL-0075			PSHWMU-SKPL-0075				
SKPL-0076			PSHWMU-SKPL-0076				
SKPL-0077			PSHWMU-SKPL-0077				
SKPL-0078			PSHWMU-SKPL-0078				
SKPL-0079			PSHWMU-SKPL-0079				
SKPL-0080			PSHWMU-SKPL-0080				
SKPL-0080			PSHWMU-SKPL-0080				

Soil Stockpile Tracking Log incorporated for tracking creation and movement of stockpiles. A working copy is required to be completed by the loader operator prior to creating or moving any stockpile. Another requirement is notification by radio to which affirms proper stockpile number and associated grid.



URS Corporation 12120 Shamrock Plaza, Suite 300 Omaha, NE 68154	Project Name: HWMU Work Plan and Removal
Project No.: 16170613	Project Location: Fort Wingate, Gallup, NM
Contract#: W912QR-04-D-0025	NCR No.: 2014-002
	MRS: HWMU Grid: N/A
	Date: 29 July 2014

NONCONFORMANCE AND CORRECTIVE ACTION REPORT

Part I (UXOQC)

Description of Nonconforming Condition⁽¹⁾:



On 28 July 2014, stockpiles SKPL-0088 and SKPL-0089 were relocated from the Area of Contamination (AOC) to the "Below Residential SSLs Stockpile" prior to receiving analytical sampling results.

Apparent Quality Requirement Not Complied With⁽²⁾:

Section 3.9 of the HWMU WP, Stockpile Management and Characterization Sampling. Specifically, "The purpose of the stockpile sampling is to identify and segregate those processed stockpiles that have constituents that meet the cleanup criteria stipulated in Attachment 7 of the RCRA Permit from those that do not."

Signature: <u></u> _____ (UXOQC)	Corrective Action Due Date: 29 Jul 14 _____ (Date)	Implement upon receipt of sampling results _____ Severity Level: 3
---	--	--

Copy Delivered to: SUXOS PM MRP QCM MRP Safety Manager

Signature: <u></u> 30 Jul 14 _____ (SUXOS)	Signature: <u></u> 30 Jul 14 _____ (PM)
---	--

Part II OPERATIONS (Responsible Process Manager)

Recommended Corrective Actions⁽³⁾:	Resurvey: <input type="checkbox"/>	Reacquire: <input type="checkbox"/>	Other: <input checked="" type="checkbox"/>
	Reprocess: <input type="checkbox"/>	Re-clear: <input type="checkbox"/>	

The analytical results were received on Tuesday and Wednesday July 29 and 30. Review of the results shows that these piles do not contain any constituents that exceed Residential SSLs nor do they have any additive health effects, therefore the material may remain where placed. Corrective actions include simplification of the stockpile tracking map and procedures. Emphasized the requirement for a thorough briefing and stockpile verification for personnel involved in sampling and movement of all stockpiles. Briefed all crew on the necessity to stop any task if instructions are not understood or if clarification is needed.

Root Cause Analysis (only for Severity Level 1)⁽⁴⁾:

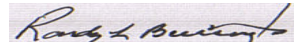
Signature: _____ N/A _____ (SUXOS) (Date)	Signature: _____ N/A _____ (PM) (Date)
---	--

Part III CORRECTIVE ACTION VERIFICATION , SUXOS, PM, UXOQC

Corrective Action Completed:

01 Aug 14
(Date)

(5) Signature:



(SUXOS)

(5) Signature:



(PM)

Corrective Action Verified On:

05 Aug 14
(Date)

(5) Signature:



(UXOQCS)

UXOQCS Comments ⁽⁶⁾:

Large empty rectangular box for comments.

Approved

Disapproved

New NCR

Number:

Signature:

(UXOQC)

Note: When all actions have been completed a copy of this form shall be forwarded to project document control as part of the project records

Photographs



The first three (3) shows the inadvertently placed soil from stockpiles SKPL-0088 and SKPL-0089 on existing SSL area



This photo shows the Northern boundary of where stockpiles SKPL-0088 and SKPL-0089 were dumped onto existing SSL area.



This photo shows the Southern boundary of where stockpiles SKPL-0088 and SKPL-0089 were dumped onto existing SSL area.



This Photo shows the area on the eastern boundary of the SSL area where stockpiles SKPL-0088 and SKPL-0089 were dumped.

URS Corporation 12120 Shamrock Plaza, Suite 300 Omaha, NE 68154	Project Name: HWMU Work Plan and Removal
	Project Location: Fort Wingate, Gallup, NM
	NCR No.: 2014-003
Project No.: 16170613	MRS: HWMU Grid: E1, E3, D2, D3
Contract#: W912QR-04-D-0025	Date: 28 August 2014

NONCONFORMANCE AND CORRECTIVE ACTION REPORT

Part I (UXOQC)

Description of Nonconforming Condition⁽¹⁾:

The 22 August 2014 morning geophysical Quality Control (QC) data was collected without real-time kinematic (RTK) positional corrections. The static and personnel tests were unaffected, and the background noise levels were recorded. The IVS seed response peaks were recorded, but the targeted seed positions could not be recovered.

Apparent Quality Requirement Not Complied With⁽²⁾:

Section 4.12.1.2 of the HWMU WP, Daily Geophysical Instrument QC Checks

Specifically, "Acceptance criteria for data repeatability include ± 20 percent for response amplitude of ISO items and ± 25 cm for positional accuracy."

Positional accuracy could not be verified to be within ± 25 cm due to the lack of RTK corrections.

Signature:



2
September
2014

Corrective Action Due Date:

5 September 2014

(Geo QC)

(Date)

Severity Level:

3

Copy Delivered to:

- SUXOS
 PM
 GEO Ops
 MRP QCM
 UXOQCS
 MRP Safety Mgr

Signature:



5 September 2014

(SUXOS)

(Date)

Signature:



5 September 2014

(PM)

(Date)

Part II OPERATIONS (Responsible Process Manager)

Recommended Corrective Actions ⁽³⁾ :	Resurvey: <input type="checkbox"/>	Reacquire: <input type="checkbox"/>	Other: <input checked="" type="checkbox"/>
	Reprocess: <input type="checkbox"/>	Re-clear: <input type="checkbox"/>	

Although the 22 August 2014 preproduction IVS data was collected without an RTK correction, the IVS seed responses are within expected tolerances (i.e., 6.8% of expected), and compare favorably to the postproduction IVS data (Attachment 1). The postproduction IVS data conforms to project tolerances for both response and positional accuracy. The GPS quality indicator for all production data collected on 22 August is "4" indicative of RTK signal reception/application as recorded in the National Marine Electronics Association (NMEA) GGA (Time, position, and fix related data) string recorded in the data file. With the exception of the preproduction IVS test, the QC indicators as described above support the correctness of the 22 August 2014 production data set.

The omission of RTK corrected positional information is isolated to the preproduction IVS data. Recommend 22 August 2014 production data is accepted without reservation. Production personnel reminded to observe visual cues on GPS hardware (blinking green light) as well as quality indicator on the acquisition software graphical interface.



URS Corporation
 12120 Shamrock Plaza, Suite 300
 Omaha, NE 68154

Project Name: HWMU Work Plan and Removal

Project Location: Fort Wingate, Gallup, NM

NCR No.: 2014-003

Project No.: 16170613

MRS: HWMU

Grid: E1, E3, D2, D3

Contract#: W912QR-04-D-0025

Date: 28 August 2014

Root Cause Analysis (only for Severity Level 1) ⁽⁴⁾:

Signature:

N/A

(SUXOS)

(Date)

Signature:

N/A

(PM)

(Date)

Part III CORRECTIVE ACTION VERIFICATION , SUXOS, PM, UXOQC

Corrective Action Completed:

(Date)

⁽⁵⁾ Signature:

(SUXOS)

⁽⁵⁾ Signature:

(PM)

Corrective Action Verified On:

(Date)

⁽⁵⁾ Signature:

M. L. Dorn

(UXOQCS)

⁽⁵⁾ Signature:

Harold W. ...

(Project Geophys.)

Project QC Geophysicist's Comments ⁽⁶⁾:

I concur with the above explanation and recommendations.

Approved

Disapproved

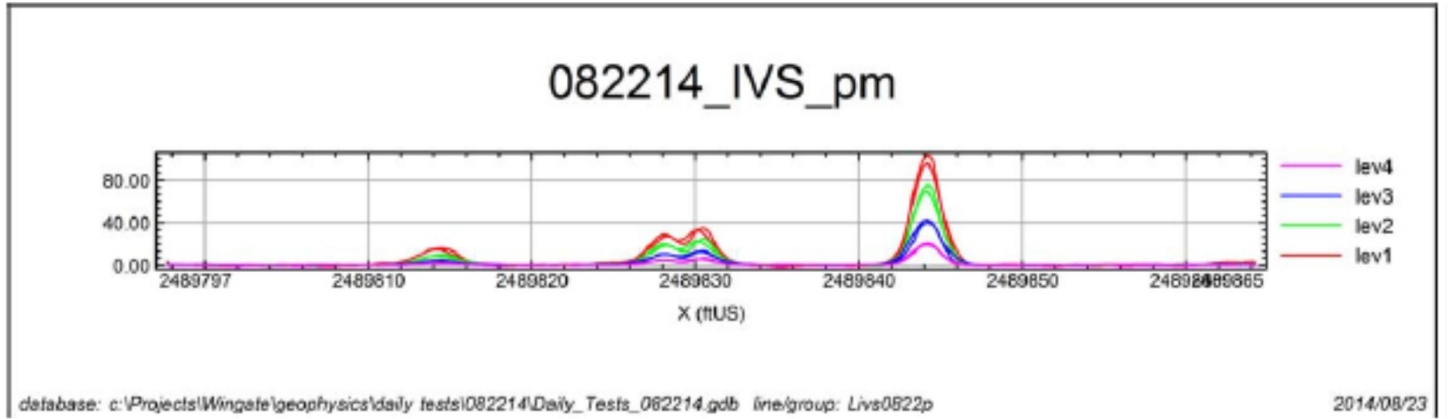
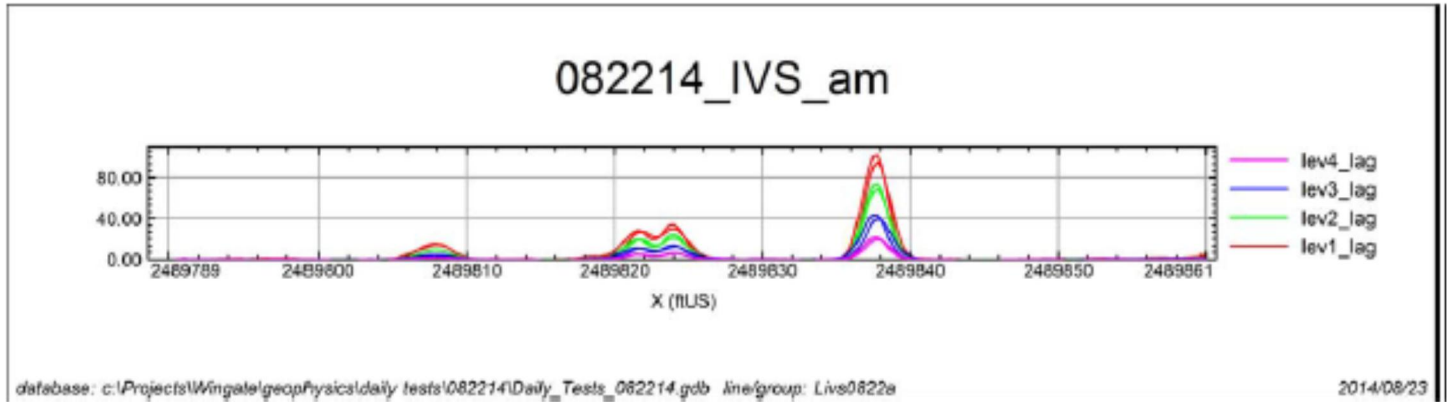
New NCR

Number: _____



Signature: _____ (UXOQCS/GEOQC)

Note: When all actions have been completed a copy of this form shall be forwarded to project document control as part of the project records


Attachment 1





<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 1 Description: Constructing CAMU berms.</p>		
<p>Photo No. 2 Description: Final grading of CAMU berms.</p>		



Client Name: USACE- Fort Worth District	Project: HWMU Work Plan and Removal	Project No. 16170613
<p>Photo No. 3</p> <p>Description: Layer of debris and burned waste discovered during construction of the CAMU.</p>		
<p>Photo No. 4</p> <p>Description: Debris located within revetment prior to removal.</p>		

<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 5 Description: Debris located within the revetment.</p>		
<p>Photo No. 6 Description: MPPEH inspection of debris removed from revetment.</p>		

<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 7</p> <p>Description: MPPEH inspection of debris removed from revetment.</p>		
<p>Photo No. 8</p> <p>Description: Inspecting a day box prior to removal.</p>		


<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 9</p> <p>Description: Removal of one of the day boxes with an excavator.</p>		
<p>Photo No. 10</p> <p>Description: ECM B-1038 prior to vegetation removal.</p>		



<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 11 Description: ECM B-1038 after vegetation removal.</p>		
<p>Photo No. 12 Description: Removing decorative munitions from FWDA main gate.</p>		



<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 13 Description: 90mm munitions removed from FWDA main gate.</p>		
<p>Photo No.14 Description: Debris and soils removed during low-water crossing construction.</p>		



<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 15 Description: Pouring concrete at low-water crossing.</p>	 <p>A photograph showing several construction workers in orange safety vests and hard hats working on a concrete slab. They are using tools to guide the pouring of concrete into a prepared formwork on a dirt site. In the background, there is a yellow front loader and a yellow excavator. The terrain is hilly with some vegetation under a cloudy sky.</p>	
<p>Photo No. 16 Description: Completed low-water crossing.</p>	 <p>A photograph of a completed low-water crossing. The crossing is a wide, flat dirt path. In the background, there is a low wall constructed from large, stacked rocks. Behind the rock wall, there is a black plastic sheeting barrier. The surrounding area is a dry, hilly landscape with sparse green and yellow vegetation.</p>	

<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 17 Description: Removal of sediments from culvert 7.</p>		
<p>Photo No. 18 Description: Covered sediment piles from culvert removal awaiting sampling results.</p>		

<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 19 Description: UXO technician completing sweep of arroyo exiting Parcel 3.</p>		
<p>Photo No. 20 Description: UXO technicians completing sweep of arroyo exiting Parcel 3.</p>		

<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 21 Description: Applying epoxy coating on floor of less than 90-day storage.</p>		
<p>Photo No. 22 Description: Interior of less than 90-day storage.</p>		



<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 23 Description: Installing security fence fabric.</p>		
<p>Photo No. 24 Description: Completed segment of security fencing.</p>		

<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 25</p> <p>Description: Cab armoring cab to 40-ton rock truck.</p>		
<p>Photo No. 26</p> <p>Description: Cab armoring to a front end loader.</p>		



<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 27 Description: Grading processing plant pad.</p>		
<p>Photo No. 28 Description: Initial processing plant assembly.</p>		



<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 29</p> <p>Description: Excavator awaiting truck placement.</p>		
<p>Photo No. 30</p> <p>Description: Excavator waiting for full truck to leave area before loading empty truck.</p>		

<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 31 Description: Excavation north of processing plant, first 18-24 inch cut.</p>		
<p>Photo No. 32 Description: Processing plant with stockpile material north and west of plant.</p>		



<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 33 Description: Processing plant with CRP01 partially excavated.</p>		
<p>Photo No. 34 Description: Processing plant with CRP01 partially excavated.</p>		

<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 35 Description: Depth of CRP01 after partial excavation.</p>		
<p>Photo No. 36 Description: Processed stockpiles awaiting sampling results.</p>		

<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 37 Description: Processed stockpiles awaiting sampling results.</p>		
<p>Photo No. 38 Description: Soils below residential SSLs stockpile.</p>		


<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 39 Description: Feed stockpile north of processing plant.</p>	 <p style="text-align: right; color: orange;">2014. 1.28 14:49</p>	
<p>Photo No. 40 Description: Typical stockpile composite soil sample.</p>	 <p style="text-align: right; color: orange;">2014. 3.21 6:50</p>	



<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 41 Description: Typical stockpile discrete soil sample.</p>		
<p>Photo No. 42 Description: Stockpile labeling to correlate sample with stockpile location.</p>		



<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 43 Description: Surface sweep prior to collecting DGM.</p>	 <p style="text-align: right; color: red;">2013.11.20 13:36</p>	
<p>Photo No. 44 Description: Surface sweep outside of CDC05 prior to collecting DGM.</p>	 <p style="text-align: right; color: red;">2013.11.20 13:52</p>	

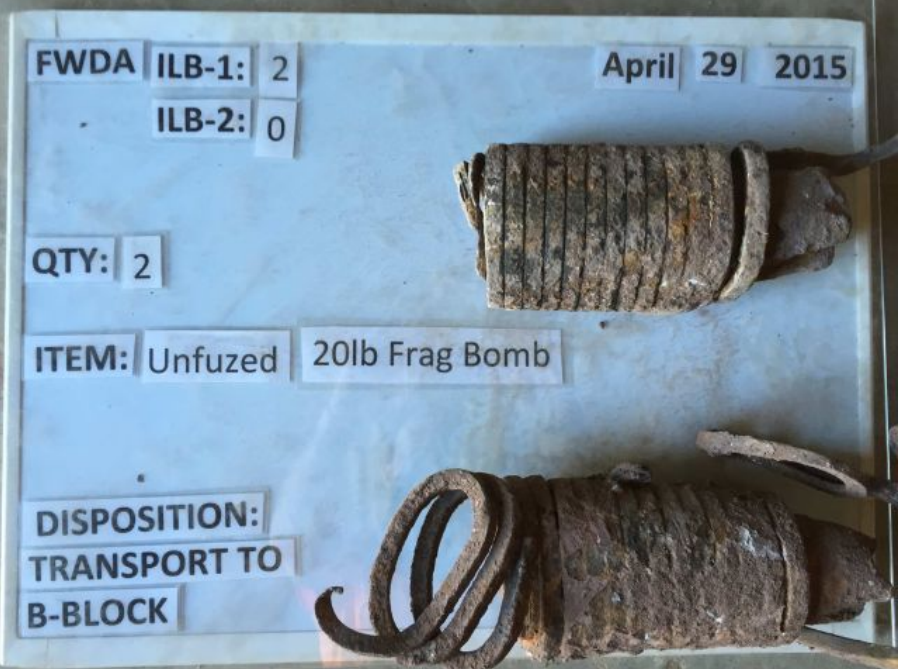
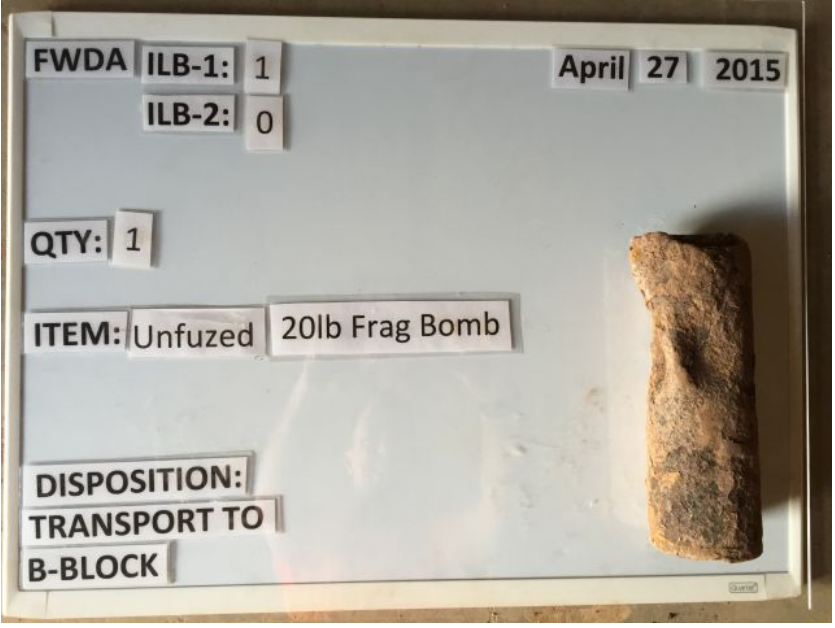
<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 45 Description: TFU delivery.</p>		
<p>Photo No. 46 Description: Loading TFU prior to flashing cycle.</p>		


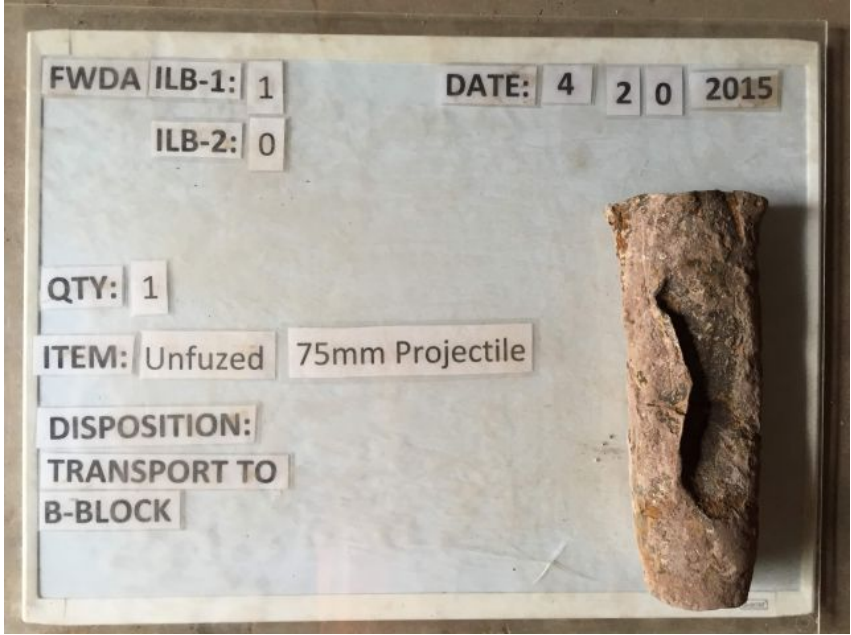
<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 47</p> <p>Description: MDAS container locked and sealed. Ready for offsite shipment.</p>		
<p>Photo No. 48</p> <p>Description: Typical barricade established during demolition shots.</p>		


<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 49 Description: Preparing for a demolition shot at the CAMU.</p>	 <p>A photograph showing two workers in a trench. One worker in a blue shirt is kneeling and handling a white cable connected to a yellow and black device. Another worker in a grey hoodie is kneeling nearby. Several white sandbags are lined up in the trench, and a cardboard box is open on the ground.</p>	
<p>Photo No. 50 Description: Demolition shot prepared and ready to initiate.</p>	 <p>A photograph showing a demolition shot prepared in a trench. A white sandbag is positioned in the center, connected to a yellow and black device. A white cable runs across the trench, leading to another yellow and black device on the left.</p>	



<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 51</p> <p>Description: Post shot inspection and cleanup.</p>		
<p>Photo No. 52</p> <p>Description: MEC item found within HWMU detonated in place.</p>		

<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 53 Description: BLU-4 submunition.</p>		
<p>Photo No. 54 Description: Example of MEC removed from processing plant</p>		

<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 55 Description: Example of MEC removed from processing plant.</p>	 <p>FWDA ILB-1: 2 April 29 2015 ILB-2: 0 QTY: 2 ITEM: Unfuzed 20lb Frag Bomb DISPOSITION: TRANSPORT TO B-BLOCK</p>	
<p>Photo No. 56 Description: Example of MEC removed from processing plant.</p>	 <p>FWDA ILB-1: 1 April 27 2015 ILB-2: 0 QTY: 1 ITEM: Unfuzed 20lb Frag Bomb DISPOSITION: TRANSPORT TO B-BLOCK</p>	

<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 57 Description: Example of MEC removed from processing plant.</p>		
<p>Photo No. 58 Description: Example of MEC removed from processing plant.</p>		

<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 59 Description: Example of MEC removed from processing plant.</p>		
<p>Photo No. 60 Description: Example of MEC removed from processing plant.</p>		

<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 61</p> <p>Description: BLU-3 discovered during sweep.</p>		
<p>Photo No. 62</p> <p>Description: Fuzed M83 butterfly bomb.</p>		

<p>Client Name: USACE- Fort Worth District</p>	<p>Project: HWMU Work Plan and Removal</p>	<p>Project No. 16170613</p>
<p>Photo No. 63 Description: M83 butterfly bomb.</p>		
<p>Photo No. 64 Description: 75 mm projectile.</p>		

Client Name: USACE- Fort Worth District	Project: HWMU Work Plan and Removal	Project No. 16170613
Photo No. 65 Description: 2,000 pound general purpose bomb.		

From: [Kirwan, Stephen E \(Eric\) SWF](#)
To: [Carson, John](#)
Subject: FW: sloping question to NMED (UNCLASSIFIED)
Date: Thursday, September 25, 2014 3:26:04 PM

Classification: UNCLASSIFIED
Caveats: NONE

John,
Below is NMEDs response/guidance for sloping outside the HWMU.

Thank you,
Eric Kirwan, PG
SWD Regional Planning and Environmental Center
U.S. Army Engineer District, Fort Worth
(817) 366-2437

-----Original Message-----

From: Wear, Benjamin, NMENV [<mailto:Benjamin.Wear@state.nm.us>]
Sent: Wednesday, September 24, 2014 2:14 PM
To: Kirwan, Stephen E (Eric) SWF; Cobrain, Dave, NMENV
Cc: 'mark.c.patterson@us.army.mil'; Smith, Steve W SWF; 'Makin, Angela N Ms ARMY GUEST USA OSA USA'; 'Esler, Christy L Ms ARMY GUEST USA OSA USA'; Slavens, Michael SWF; Carpenter, Martin S SPA
Subject: [EXTERNAL] RE: sloping question to NMED (UNCLASSIFIED)

Eric and others,

Per our discussion this morning, we concur with your plan to excavate areas just outside the boundary of the HWMU in order to maintain sidewall slope stability criteria that will allow field personnel safe access to the bottom of a hole to perform geophysics & soil sampling.

NMED also provides the following direction:

1. Ensure that excavated soil stockpiles outside of the HWMU boundary are protected in such a way as to minimize or alleviate any erosional migration of soils from the stockpiles.
2. If possible, segregate soils into potentially contaminated and potentially uncontaminated stockpiles
3. Document the excavation locations, stockpile locations, and approximate stockpile volumes. Include a discussion of these operations in the final report that also provides a path forward for managing the excavated soils through follow-on contracts.

Thank you,

Ben Wear
Environmental Scientist
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Dr. East, Bldg. 1
Santa Fe, NM 87505
(505) 476-6041

-----Original Message-----

From: Kirwan, Stephen E (Eric) SWF [<mailto:Stephen.E.Kirwan@usace.army.mil>]
Sent: Tuesday, September 23, 2014 6:16 AM
To: Cobrain, Dave, NMENV; Wear, Benjamin, NMENV
Cc: 'mark.c.patterson@us.army.mil'; Smith, Steve W SWF; 'Makin, Angela N Ms ARMY GUEST USA OSA USA';

'Esler, Christy L Ms ARMY GUEST USA OSA USA'; Slavens, Michael SWF; Carpenter, Martin S SPA
Subject: sloping question to NMED (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Dave/Ben,

We are running into some areas at the HWMU boundary where we will exceed the maximum safe excavation sidewall slope criteria. In order to maintain a safe slope URS needs to remove some dirt just outside the HWMU boundary to allow field personnel safe access to the bottom of a hole to perform geophysics & soil sampling. This will likely occur in several locations. Since handling soil outside the HWMU is outside URS' contract (and we are unable to mod it), the Army feels the best course of action is to have URS place the dirt in a pile outside the HWMU. The Army plans to include these pile(s) in a future contract dealing with the area surrounding the HWMU. This soil is not in the HWMU and is only being removed for safety reasons. The HWMU boundary will remain as is. The Army is asking for your concurrence.

Thank you,

Eric Kirwan, PG
SWD Regional Planning and Environmental Center U.S. Army Engineer District, Fort Worth
(817) 366-2437

Classification: UNCLASSIFIED
Caveats: NONE

Classification: UNCLASSIFIED
Caveats: NONE

From: [Kirwan, Stephen E \(Eric\) SWF](#)
To: [Carson, John](#)
Subject: FW: FWDA Confirmation Sampling Grids (UNCLASSIFIED)
Date: Thursday, October 09, 2014 3:32:51 PM

Classification: UNCLASSIFIED
Caveats: NONE

John,
See NMED's response below. Thoughts?

Thank you,
Eric Kirwan, PG
SWD Regional Planning and Environmental Center
U.S. Army Engineer District, Fort Worth
(817) 366-2437

-----Original Message-----

From: Cobrain, Dave, NMENV [<mailto:dave.cobrain@state.nm.us>]
Sent: Thursday, October 09, 2014 4:30 PM
To: Kirwan, Stephen E (Eric) SWF; Wear, Benjamin, NMENV
Cc: Smith, Steve W SWF; Patterson, Mark C Mr CIV USA OSA
Subject: [EXTERNAL] RE: FWDA Confirmation Sampling Grids (UNCLASSIFIED)

Eric,

Combining grids with an additive aerial extent less than or equal to 10,000 square feet sounds reasonable. The only concern is with the distribution of the subsamples if the combined areas have unusual shapes. We want to ensure that the subsamples are representative of the soils across the combined area, which could be difficult. A conservative way to do that would be to bias the samples areas that would most likely be affected by contaminants. Give me a call if you want to discuss. Sorry for the delayed response.

Thanks.

Dave

Main HWB Phone: 505-476-6000
Direct Office Phone: 505-476-6055
Fax: 505-476-6030 or 505-476-6060

-----Original Message-----

From: Kirwan, Stephen E (Eric) SWF [<mailto:Stephen.E.Kirwan@usace.army.mil>]
Sent: Thursday, October 02, 2014 11:10 AM
To: Wear, Benjamin, NMENV; Cobrain, Dave, NMENV
Cc: Smith, Steve W SWF; Patterson, Mark C Mr CIV USA OSA
Subject: FWDA Confirmation Sampling Grids (UNCLASSIFIED)
Importance: High

Classification: UNCLASSIFIED
Caveats: NONE

Dave/Ben,

As URS starts confirmation sampling within the HWMU it's becoming clear the language in the WP needs to be

tweaked. Below is language URS put together to explain they're requested change.

Per the approved Work Plan for confirmation sampling the excavations; we are collecting bottom and sidewall samples from within the CRPs and CDCs. For areas outside of the CRPs and CDCs, we are applying a "grid system". The grids system overlays the site and each grid is approximately 100 feet by 100 feet (10,000 square feet). As we are excavating and obtaining a debris clean bottom, the excavation limits of the CRPs and CDCs are changing from what was originally anticipated. As a result, have partial grids along the HWMU boundary and the final limits of an excavated CRP or CDC. In these instances, where it is appropriate, we would like to combine partial grids for confirmation sampling. Combined grids will be no more than 10,000 square feet in area and at least 16 subsamples (per approved WP) will be collected from the area as depicted on Figure 3-7 of the Work Plan. When grids are combined, GPS coordinates of the combined grid will be captured so they can be associated with the sample ID to demonstrate that partial grids were sampled for reporting purposes. For example if the total area of grid B9 and C9 combined is less than 10,000 square feet, we would combine those grids and collect one sample (of at least 16 subsamples) that would represent the conditions for both partial grids.

As not to impact URS' schedule, we would like to receive concurrence (or any feedback) on this as quickly as possible, so any expedited consideration is greatly appreciated. If you have any questions feel free to contact me.

Thank you,
Eric Kirwan, PG
SWD Regional Planning and Environmental Center U.S. Army Engineer District, Fort Worth
(817) 366-2437

Classification: UNCLASSIFIED
Caveats: NONE

Classification: UNCLASSIFIED
Caveats: NONE

From: [Kirwan, Stephen E \(Eric\) SWF](#)
To: [Carson, John](#)
Subject: FW: Characterization of Grids D2, D3, & E3 (UNCLASSIFIED)
Date: Thursday, October 23, 2014 10:19:00 AM

Classification: UNCLASSIFIED
Caveats: NONE

John,

For your records.

Thank you,
Eric Kirwan, PG
SWD Regional Planning and Environmental Center
U.S. Army Engineer District, Fort Worth
(817) 366-2437

-----Original Message-----

From: Wear, Benjamin, NMENV [<mailto:Benjamin.Wear@state.nm.us>]
Sent: Wednesday, October 22, 2014 4:05 PM
To: Kirwan, Stephen E (Eric) SWF; Cobrain, Dave, NMENV
Cc: Smith, Steve W SWF; Carpenter, Martin S SPA; Slavens, Michael SWF
Subject: [EXTERNAL] RE: Characterization of Grids D2, D3, & E3 (UNCLASSIFIED)

Eric,

The map and spreadsheets you provided are unclear as to where the samples were collected and/or how they were collected, so we are unable to comment directly on these specific results.

That being said, as long as the approved work plan sampling protocol for establishing that the excavation floor soils are below screening levels, cancer risk, and hazard quotient was followed and proof of such is provided in the final report, processed soils which tested below those values, as well, may be placed back into those excavated locations.

Thanks,

Ben Wear

Environmental Scientist

Hazardous Waste Bureau

New Mexico Environment Department

2905 Rodeo Park Dr. East, Bldg. 1

Santa Fe, NM 87505

(505) 476-6041

From: Kirwan, Stephen E (Eric) SWF [<mailto:Stephen.E.Kirwan@usace.army.mil>]
Sent: Wednesday, October 22, 2014 1:05 PM
To: Wear, Benjamin, NMENV; Cobrain, Dave, NMENV
Cc: Smith, Steve W SWF; Carpenter, Martin S SPA; Slavens, Michael SWF
Subject: Characterization of Grids D2, D3, & E3 (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Dave/Ben,

URS has characterized the area made up by part of grids D2 (part not included in CRP1 characterization), D3 (partial grid due to HWMU boundary), & E3 (part of grid not within sift plant area) within the HWMU. The results are attached. I've also included a map identifying the area. URS is requesting to place processed soils back into the grids, which tested below SSLs & below 1 with respect to cumulative risk. The Army has reviewed and is requesting NMED review and concur with the results.

Thank you,

Eric Kirwan, PG
SWD Regional Planning and Environmental Center

U.S. Army Engineer District, Fort Worth
(817) 366-2437

Classification: UNCLASSIFIED
Caveats: NONE

Classification: UNCLASSIFIED
Caveats: NONE

From: [Kirwan, Stephen E \(Eric\) SWF](#)
To: [Carson, John \(Omaha\)](#); [Mitchell, Jeny](#)
Subject: FW: FWDA Grid D4, E5, E6, and CRP02 Data Package (UNCLASSIFIED)
Date: Tuesday, January 13, 2015 9:03:46 AM

Classification: UNCLASSIFIED
Caveats: NONE

John,

See response from MNED below.

Thank you,
Eric Kirwan, PG
SWD Regional Planning and Environmental Center
U.S. Army Engineer District, Fort Worth
(817) 366-2437

-----Original Message-----

From: Wear, Benjamin, NMENV [<mailto:Benjamin.Wear@state.nm.us>]
Sent: Tuesday, January 13, 2015 9:58 AM
To: Kirwan, Stephen E (Eric) SWF; Cobrain, Dave, NMENV
Cc: Mark C Mr CIV USA OSA 'Patterson; Smith, Steve W SWF; Esler, Christy L Ms ARMY GUEST USA OSA USA; Makin, Angela N Ms ARMY GUEST USA OSA USA
Subject: [EXTERNAL] RE: FWDA Grid D4, E5, E6, and CRP02 Data Package (UNCLASSIFIED)

Eric,

Based on the data provided, it appears that the portions of grids D4, E5, & E6 (which includes CRP02) described in the attachment have been appropriately characterized. Should future data or information become available that disputes the information provided, NMED reserves the right to rescind our concurrence.

Thank you,

Ben Wear
Environmental Scientist
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Dr. East, Bldg. 1
Santa Fe, NM 87505
(505) 476-6041

-----Original Message-----

From: Kirwan, Stephen E (Eric) SWF [<mailto:Stephen.E.Kirwan@usace.army.mil>]
Sent: Tuesday, January 13, 2015 6:58 AM
To: Wear, Benjamin, NMENV; Cobrain, Dave, NMENV
Cc: Mark C Mr CIV USA OSA 'Patterson; Smith, Steve W SWF; Esler, Christy L Ms ARMY GUEST USA OSA USA; Makin, Angela N Ms ARMY GUEST USA OSA USA
Subject: FW: FWDA Grid D4, E5, E6, and CRP02 Data Package (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Dave/Ben,

URS (now part of AECOM) has characterized portions of grids D4, E5, & E6 (which includes CRP02). URS' submittal package is attached. The grid was tested according the approve WP and tests are below SSLs & below 1 with respect to cumulative risk. The Army has reviewed and is requesting NMED review and concur with the results.

Thank you,
Eric Kirwan, PG
SWD Regional Planning and Environmental Center U.S. Army Engineer District, Fort Worth
(817) 366-2437

-----Original Message-----

From: Carson, John (Omaha) [<mailto:john.c.carson@aecom.com>]
Sent: Monday, January 12, 2015 4:51 PM
To: Kirwan, Stephen E (Eric) SWF
Cc: Mitchell, Jeny
Subject: [EXTERNAL] FWDA Grid D4, E5, E6, and CRP02 Data Package

Eric-

Attached is a revised package of data to review demonstrating we have cleaned up portions of D4, E5, E6, and CRP02 to the plant pad, where we intend to place soils. The package includes revised figures showing the grid location (with plant boundary), DGM and selected targets, and sample locations, a spreadsheet of the target anomaly resolution, analytical results, and the cumulative risk calculations.

If you have any questions, please give me a call.

John C. Carson, PE

Senior Project Manager, Environmental, Midwest Region

D 1-402-952-2514

John.c.carson@aecom.com

AECOM

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Classification: UNCLASSIFIED
Caveats: NONE

Classification: UNCLASSIFIED
Caveats: NONE

From: [Kirwan, Stephen E \(Eric\) SWF](#)
To: [Carson, John](#)
Subject: FW: Characterization below CRP1 (UNCLASSIFIED)
Date: Thursday, September 25, 2014 3:26:03 PM

Classification: UNCLASSIFIED
Caveats: NONE

John,
Here is NMED's response to CRP1 data.

Thank you,
Eric Kirwan, PG
SWD Regional Planning and Environmental Center
U.S. Army Engineer District, Fort Worth
(817) 366-2437

-----Original Message-----

From: Wear, Benjamin, NMENV [<mailto:Benjamin.Wear@state.nm.us>]
Sent: Wednesday, September 24, 2014 5:31 PM
To: Kirwan, Stephen E (Eric) SWF; Cobrain, Dave, NMENV
Cc: Smith, Steve W SWF; 'mark.c.patterson@us.army.mil'
Subject: [EXTERNAL] RE: Characterization below CRP1 (UNCLASSIFIED)

Eric,

You have our concurrence.

Thanks,

Ben Wear

Environmental Scientist

Hazardous Waste Bureau

New Mexico Environment Department

2905 Rodeo Park Dr. East, Bldg. 1

Santa Fe, NM 87505

(505) 476-6041

From: Kirwan, Stephen E (Eric) SWF [<mailto:Stephen.E.Kirwan@usace.army.mil>]
Sent: Wednesday, September 24, 2014 2:47 PM

To: Wear, Benjamin, NMENV; Cobrain, Dave, NMENV
Cc: Smith, Steve W SWF; 'mark.c.patterson@us.army.mil'
Subject: Characterization below CRP1 (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Dave/Ben,

URS has characterized the area below CRP1 within the HWMU. The results are attached. URS is requesting to place processed soils back into the excavation, which tested below SSLs & below 1 with respect to cumulative risk. The Army has reviewed and is requesting NMED review and concur with the results.

Thank you,

Eric

Classification: UNCLASSIFIED
Caveats: NONE

Classification: UNCLASSIFIED
Caveats: NONE

**FINAL REMOVAL WORK PLAN AT THE
FORT WINGATE DEPOT ACTIVITY, MCKINLEY COUNTY, NM
COMMENT RESPONSE TABLE
DOCUMENT SUBMITTED NOVEMBER 09, 2011
COMMENTS RECEIVED AUGUST 16, 2012**

Comment Number	Page No. Line No.	New Page or Sheet	Comment	Recommendation	Response
<i>New Mexico Environment Department (John Kieling)</i>					
GENERAL COMMENTS					
N-1			NMED understands the Permittee intends to establish a new Area of Contamination to manage waste generated during cleanup activities associated with the Hazardous Waste Management Unit (HWMU). The Permittee is reminded to submit a letter requesting the addition of the Area of Contamination, which must include a map that identifies the boundary of the Area of Contamination, to NMED for approval.		Comment noted. The Permittee will prepare and submit a request to establish an Area of Contamination to the NMED for approval for any areas outside the HWMU used to manage waste.
N-2			NMED does not typically review Standard Operating Procedures (SOPs) or Quality Assurance Project Plans (QAPPs); however, due to the inclusive nature of these documents to this Work Plan, the SOPs and QAPPs have been reviewed. The SOPs presented in Appendix I, Field Standard Operating Procedures are generalized. Include SOPs which are specific to, and describe the precise activities necessary for, executing the removal activities outlined in the		Per our discussions with NMED and subsequent e-mail from the Lane Andress (NMED reviewer) indicated that this comment was intended toward SOPs from an unrelated Work Plan. During the discussion, it was noted that specifically SOP No. 15 was missing (please see Comment 31). By addressing the NMED's specific comments to the Work Plan, we assume that this comment will be effectively addressed.

			Work Plan. Revise the current Work Plan to provide specific descriptions of the proposed methods and procedures for conducting the removal activities, waste management, and sampling of environmental media	
N-3			Appendices; in the hard copy of the revised Work Plan insert a page to the "Appendices" tab which includes a list of all Appendices included on the CD attached to the Work Plan.	A page will be inserted following the Appendices tab that lists the Appendices included on the CD.
N-4			<p>The footnotes in Table 3-2 Confirmation and Characterization Soil Screening Levels, Fort Wingate Depot Activity, McKinley County, New Mexico list the NMED 2009 Soil Screening Levels (SSLs) and the USEPA 2009 Regional Screening Levels (RSLs). NMED updated the soil screening guidance (SSG) in February 2012. Permittee is directed to use updated SSLs provided in Table A-1 (NMED Soil Screening Levels) of the NMED Risk Assessment Guidance for Site Investigations and Remediation February 2012. A copy of this document can be found on NMEDs website: http://www.nmenv.state.nm.us/HWB/guidance.html The most recent version of the SSG must now be used in the evaluation of site data instead of the NMED 2009 version. When no NMED SSL is listed for a constituent, the current update to the USEPA RSLs must be used. Correct Table 3-2 in the revised Work Plan to reflect the most</p>	The updated SSLs provided in Table A-1 (NMED Soil Screening Levels) of the NMED Risk Assessment Guidance for Site Investigations and Remediation February 2012 will be used. When no NMED SSL is listed for a constituent, the current USEPA RSLs will be. Table 3-2 will be updated to reflect the current SSLs and RSLs.

			current SSLs and RSLs		
<i>SPECIFIC COMMENTS</i>					
N-5			Appendix I, Field Standard Operating Procedures, lists SOP No. 15, Flashing of [Munitions debris] MD in the table of contents, however, SOP 15 is not included in Appendix I. In the revised Work Plan incorporate SOP No. 15, Flashing of MD in revised Work Plan, including details regarding the staging of materials to be flashed, flashing process, a description of potential waste generation, if any, and the transporting of flashed materials off site.		The Permittee is currently considering available options for executing the flashing process and the SOP is dependent on the selected vendor to provide the equipment/service. After verbal discussions with the NMED via teleconference on October 2, 2012 and in response to Comment 31, Section 3.10 of the Work Plan will be revised to include a more detailed description of the the flashing process and SOP 15 will be removed from Appendix I.
N-6			Several acronyms are used in the appendices that are not defined or on the list of acronyms (e.g., RFD, "ESS/ESP/CSS" (only ESS is on acronym list), HE, "EMR/HERO", NONEL, PETN, ECO, DMM, HTRW) and in the Work Plan (e.g., Section 3.11, MPPEH Inspection Process, page 3-15 line 3 the acronym for DMM is used, and it is not in acronym list). All acronyms used in the work plan and appendices must be defined when first used and also be included in the List of Abbreviations and Acronyms included on page i of the Work Plan. Revise the Work Plan accordingly		Acronyms will be spelled out at first use throughout the work plan and the acronym list in the work plan will be updated to include missing acronyms.
N-7			In Appendix E, Munitions Constituents, QAPP worksheet #15 (UFP-QAPP Manual Section 2.8.1)-		Worksheet #15 will be revised to include TAL metals. Associated sections of the work plan will be

			Reference Limits and Evaluation Table, Analytical Group: Metals, page 15-11 the list of analytes provided indicates that the analysis of RCRA 8 metals will be performed on samples associated with the HWMU. The Permittee must analyze all samples undergoing metals analysis associated with the HWMU for Target analyte List (TAL) metals or provide justification for a more limited analyte list. Modify all associated sections of the revised Work Plan accordingly		modified accordingly.
N-8			In Appendix E, Munitions Constituents Sampling and Analysis Plan, QAPP Worksheet #19 (UFP-QAPP Manual Section 3.1.1)-- Analytical SOP Requirements Table, page 19-1, fifth row the Permittee states laboratory analyses for explosives will be completed via USEPA Method 8330B and that the sample volume to be collected for analysis will be 8 ounces (oz). USEPA Method 8330B requires a sample size of 1 kg (35.27 oz) if multi-incremental (MI) sampling is conducted. Propose to collect the sample volume required by USEPA Method 8330B for MI sampling, as applicable. Edit QAPP Worksheet #19 and appropriate sections of the revised Work Plan to ensure adequate sample volume is collect to obtain defensible results from laboratory analyses for explosives		QAPP Worksheet #19 and all applicable section of the Work Plan will be revised to indicate that the laboratory analysis for explosives will be completed via USEPA Method 8330a.

N-9			<p>Section 1.6.1.1 HWMU, page 1-4, last paragraph, the Permittee states there are "...10 areas identified as Current Residue Piles (CRPs) 1 through 10..." Figure 1-2, HWMU and CAMU Location, Figure 3-4 Proposed Excavation Areas, and Figure 3-7, Anticipated Sampling Plan shows the locations of the CRPs, however CRP4 is not located on any of these figures. Revise relevant figures to include CRP4.</p>		<p>Figures 1-2, 3-4, and 3-7 will be revised to show CRP4.</p>
N-10			<p>Section 1.6.1.1 HWMU, bottom page 1-4, top page 1-5 indicates that areas impacted by open burn/open detonation (OB/OD) activities in the HWMU may lie beyond the marked boundary of the HWMU. The revised Work Plan must include a discussion regarding action(s) to be taken when newly discovered detonation craters, CRPs, and other range-related debris (RRD), which overlaps the boundary or lie just beyond the boundary of the HWMU, is encountered during HWMU investigation and removal activities.</p>		<p>A paragraph will be added to the end of Section 3.18 that states: "Newly discovered areas impacted by OB/OD activities that lie beyond the marked boundary of the HWMU will remain in place and be addressed during follow on activities. Excavation side slopes at the HWMU boundary will be graded and stabilized as described in Sections 3.18.1 and 3.18.2."</p>
N-11			<p>Section 1.6.1.1 HWMU, bottom of page 1-4 and top of page 1-5; synopsis of historical activities at the HWMU do not include partial treatment and disposal of wastes from the trinitrotoluene (TNT) washout lagoons. Include all available information regarding waste from the TNT washout lagoons which was transported to and treated at the</p>		<p>Upon review of the Parcel 3 Summary History Report and Phase IA Report (Appendix E of the History Report) wastes from the TNT Washout Lagoon was not burned at the HWMU. Recommend that no changes be made to the text.</p>

			HWMU in the revised Work Plan.	
N-12			Based on the information presented in Section 1.14.3 1996-1998 Facility-Wide Removal Activities, page 1-10, line 19 it is not clear if Munitions and Explosives of Concern (MEC) debris was removed from the HWMU during this time period, or the estimated volume removed. Provide clarification on the types and amount of MEC debris removed from the HWMU during this time period.	The following text will be added to the end of the section: “Approximately 262 MEC items were removed from the areas, including 20 mm, 37 mm, and 40 mm projectiles, M20 boosters, BLU-2, BLU-3, and BLU-4 bomblets and various fuzes.”
N-13			In Section 1.14.4 1996 Phase IA – Characterization and Assessment of Site Conditions for the Soils/Solid Matrix, page 1-11, line 9 the Permittee states “[t]he trenching operations at the five detonation craters identified scattered ordnance fragments...” According to Figure 1-2, HWMU and CAMU Location, Fort Wingate Depot Activity, McKinley County, New Mexico, there are 12 current detonation craters (CDCs), it is unclear which five detonation craters are referenced. In the revised report, define which five CDCs are referred to in this statement. In addition, label the current detonation craters (CDCs) and CRPs on the Figure (1-2).	The sentence will be revised to state: “The trenching operations at the five detonation craters (CDC02, CDC04, CDC06, CDC-8, and CDC10) identified scattered ordnance fragments, projectiles, ash...”
N-14			Section 2.3.14 Natural Resources Manager, page 2-7 indicates a Natural Resources Manager will be responsible for managing wetland and Threatened & Endangered (T&E) surveys as well as manage compliance	The following will be inserted as a new Section: Section 2.3.15 Other Agencies Other agencies that will provide technical or regulatory oversight of

			with the Environmental Protection Plan. Include a section listing the various governmental agencies and organizations providing technical and regulatory oversight of the wetland and T&E surveys as well as the environmental restoration of the site in the revised Work Plan.		wetland and T&E surveys and site restoration include: <ul style="list-style-type: none"> • United States Fish and Wildlife Service • NMED Water Quality Bureau • USACE Albuquerque District • McKinley County Extension Office
N-15			In Section 3.3 HWMU Boundary and Topographic Land Survey, page 3-3, line 16 the Permittee states "...will complete flyover stereo photography and generate a topographic survey of the HWMU before fieldwork begins and after the removal has been completed." Indicate that before and after removal flyover stereo photographs and topographic surveys will be included with the final report.		The following sentence will be added to the end of the Section: "The flyover stereo photography and topographic surveys will be included in an appendix in the Removal Report."
N-16			In Section 3.4.4 Processing Plant Setup, page 3-5, line 8 the Permittee states "[Geophysical digital mapping] DGM data will be collected over the footprint area, as described in Section 3.16..." Section 3.16 refers to confirmation soil sampling and not post-excavation DGM. Correct this error in the revised Work Plan.		The sentence will be changed to state: "DGM data will be collected over the footprint area, as described in section 3.14, to subsurface target..."
N-17			Figure 3-2, Processing Plant Site Map, Fort Wingate Depot Activity, McKinley County, New Mexico and Figure 3-3, Processing Plant Site Map, Fort Wingate Depot Activity, McKinley County, New Mexico does not label the CRPs or CDCs depicted		The CDCs and CRPs will be labeled on Figure 3-2. Figure 3-3 will be further labeled to identify the CDCs, CRPs and the processing plant elements.

			in green on the figure. CDC1 is labeled as a “Clean Stockpile”. Clearly depict the locations of the CRPs and CDCs and differentiate them from the locations of future processing plant items on a figure in the revised Work Plan.	
N-18			Figure 3-3 Processing Plant Site Map, Fort Wingate Depot Activity, McKinley County, New Mexico, does not show the foot print of the processing plant. Depict and label the foot print of all the components of the processing plant on a figure in the revised Work Plan.	The processing plant and its components will be included on Figure 3-3.
N-19			In Section 3.5 Surface Clearance, bottom of page 3-5 to top of page 3-6 the Permittee states “[t]he HWMU will be divided into 200 foot by 200 foot grids. Each grid will be divided into search lanes to ensure complete coverage for each grid.” In the revised Work Plan provide more information regarding how many search lanes are anticipated and the width of the search lanes. Appendix I, Field Standard Operating Procedures, Section 6.2.2.2 100 Percent Grid Survey, page 6-5, line 27 states “[g]enerally an area will be divided into 100-foot by 100-foot grids...” The grid size must be consistent throughout the revised Work Plan or justification for any differences must be provided.	The second and third sentences of the paragraph will be changed to state: “The HWMU will be divided into 100 foot by 100 foot grids. Each grid will be divided into 20, five foot wide search lanes to ensure complete coverage of each grid.”
N-20			In Section 3.6 Vegetation Removal, page 3-6, line 9 the Permittee states “[r]emoved vegetation will be	The last sentence of the paragraph will be deleted and the following paragraph will be added to the

			stockpiled outside of, but adjacent to the HWMU.” It is likely that small amounts of soil will be generated in the vegetation removal process (e.g., shallow soils around roots of vegetation) which may contain MEC and MD. No detail is given in the Work Plan regarding soils generated from vegetation removal processes, the process of screening for and removing MEC and MD, the ultimate disposal the soils or stockpiled removed vegetation. Include this information in the revised Work Plan.		section: “As the vegetation is removed, UXO Technicians will observe and inspect the vegetation for MEC and MD. If MEC or MD is identified in the vegetation or root mass, the vegetation will be segregated and further inspected as described in Section 3.11. The vegetation will be stockpiled within the HWMU footprint and allowed to decompose. Any future disposal of the vegetation will be completed under additional corrective action.”
N-21			In Section 3.7 Debris and Incidental Soils Excavation, page 3-6, line 14 the Permittee states “...the anticipated excavation areas shown in Figure 3-4.” However, Figure 3-4 Proposed Excavation Areas, Fort Wingate Depot Activity, McKinley County, New Mexico, does not clearly depict excavation areas. In the revised Work Plan, revise all appropriate figures to clearly depict areas to be excavated using a designated key or outline color and description (e.g., anticipated excavation areas) on the relevant figure(s).		The figure depicts all areas of anticipated excavation. The legend will be revised to note that the areas shown on the figure are the anticipated limits of excavation.
N-22			In Section 3.7.1 Excavation Sequence, page 3-6, line 18 the Permittee states “[s]oils and debris will be excavated from the areas shown in Figure 3-4... the total quantity of debris to be excavated is provided in Table 3-1.” The four areas shown in Table 3-1 Anticipated Quantities and Excavation		The “Other Areas of Potential Subsurface Debris” will be labeled 1 through 4 on Figure 3-4 and other relevant figures.

			Depths, Fort Wingate Army depot Activity, McKinley County, New Mexico as 'Other Areas of Potential Subsurface Debris' 1 through 4, cannot be matched to corresponding areas of Figure 3-4 Proposed Excavation Areas, Fort Wingate Depot Activity, McKinley County, New Mexico as the areas designated as 'Other Areas of Potential Subsurface Debris' are not numbered on the figure. Label 'Other Areas of Potential Subsurface Debris' 1 through 4 on all relevant figures in the revised Work Plan.	
N-23			In Section 3.7.1 Excavation Sequence, page 3-6, line 23 the Permittee states "[e]xcavation operations will generally be completed working from... (south to north) of the arroyo to prevent re-contamination of the areas where excavation work has been performed. The Work Plan Figure 3-3, Processing Plant Site Map, Fort Wingate Army depot Activity, McKinley County, New Mexico show the processing plant will be set up in the southern portion of the HWMU. In the revised Work Plan, explain the procedures to prevent areas that have been previously excavated (i.e., they lie between processing plant and area of active excavation) from being re-contaminated.	The following text will be added to the end of the paragraph: "Transport trucks will utilize common haul roads to and from the processing plant. By using common haul roads, the area for potential recontamination will be limited to these common roads. Upon completion of the excavation and hauling activities, UXO technicians will complete a "mag and dig" operation of the common road areas. A DGM survey of the haul roads will be completed to document that target anomalies have been resolved."
N-24			In Section 3.7.2 Excavation Method, page 3-7, line 30 the Permittee states "[w]hen the modeled limits of an	The first sentence will be revised to state the following: "When the modeled limits of an excavation have

		<p>excavation have been reached, Unexploded Ordinance (UXO) technicians will complete an instrument aided visual inspection...to determine if the Digital Geophysical Mapping (DGN) verification of the excavation is appropriate.” Explain what is meant by this statement as well as provide detail on how the instrument aided visual inspection will be performed, including the instruments that will be used, in the revised Work Plan.</p>		<p>been reached, UXO technicians will complete an instrument aided visual inspection of each excavation to verify that debris has been removed prior to collecting DGM of the excavation. The visual inspection will be completed by a UXO technician equipped with a hand held detector such as a Schonstedt GA-52CX magnetic locator or a White’s or Minelab’s all metal detector. The UXO technician will visually inspect the surface and use the detector to identify any area that may have a high density of subsurface anomalies and require additional removal. If visual or detector evidence of debris is not identified, the area will be considered ready for DGM collection,”</p>
<p>N-25</p>		<p>In Section 3.8.1 Grizzly Feeder and Screen, page 3-9, line 14 the Permittee states “...the resulting oversize material that does not fall between the grizzly bars will transition across the grizzly to an “oversize” pile. On line 18 of the same page the Permittee states “...the oversize materials will be visually inspected by UXO technicians. Based on findings this material may be re-fed into the grizzly.” If “oversize” material is material that was too big to initially fall between the grizzly bars it is unclear why this material would be re-fed into the grizzly. Provide clarification in the revised Work Plan.</p>		<p>The second sentence of the paragraph will be revised to state: “This material may be re-fed into the grizzly if it is discovered that "blanketing" of material over the grizzly occurred, thus not allowing smaller material to fall through. "Blanketing" occurs when larger rocks or debris become lodged in the grizzly bars or cover the grizzly bars to the point that it creates a blanket over an area of the bars and does not allow smaller (less than 6-inch) material to pass through. If this occurs and less than 6-inch material is found in the "oversize" pile, UXO technicians will clear the grizzly of</p>

					lodged materials when the plant is shut down. The smaller material located in the "oversize" pile will be picked up by a remote front-end loader and re-run over the grizzly.”
N-26			In Section 3.8.3 Triple Deck Screen, page 3-10, line 28 the Permittee states “[m]aterials passing through the 5/8-inch screen will be deposited onto a conveyor beneath the screen. The conveyor will transport the material to a stockpile area where a rotating stacker... will spread the materials onto the stockpile.” According to Figure 3-5 Processing Plant Schematic, Fort Wingate Army depot Activity, McKinley County, New Mexico, there is a “post screen overhead magnet” and “metallic debris collection” station on the conveyor between the 5/8-inch screen and the stockpile area. In the revised Work Plan, describe all portions of the processing plant along with the function of each constituent.		The second paragraph of the section will be deleted. The following text will be inserted at the end of Section 3.8.4: ‘Material that passes through the 5/8" bottom screen of the Triple Deck Screen will be deposited onto a flat 20' long, 6' wide conveyor. The screened material will be spread into a thin layer on this conveyor and subjected to a "polishing" exposure of a post-screen overhead electromagnet. Ferrous material that is picked-up by the overhead magnet will be deposited into a metallic debris collection bin staged adjacent to the conveyor and magnet. This "polishing" exposure is a final quality step prior to being deposited onto the radial stacker for stockpiling.’”
N-27			In Section 3.8.6 Size Reduction, page 3-11, lines 14 – 25 the Permittee describes the final step of the materials separation process which uses a hammer mill to reduce size of materials. Provide a discussion of the potential for explosive hazards while using the hammer mill and the proposed precautionary measures.		The following text will be inserted at the end of the second paragraph of Section 3.8.6: “The potential for a high order detonation within the 2 inch thick hardened steel hammer mill is unlikely. Prior to entering the hammer mill, ferrous materials will have been removed by one of the three overhead electromagnets. Essential personnel will be protected by the requisite shielding and distance in accordance with the DDESB-approved ESS if an

					unanticipated detonation should occur.”
N-28			In Section 3.8.7 Eddy Current Non-Ferrous Metal Removal the Permittee states “[t]he entire contents of the non-ferrous waste collection from the eddy-current process will be transported to the CAMU and burned in accordance with Appendix I, SOP No. 14...” In the revised Work Plan, provide the details regarding the disposition of the burn residues resulting from these activities.		The following text will be added to the end of the Section: “An MPPEH inspection will be completed on the post-burn residues as described in Section 3.11. Ash generated from the burn will be containerized for disposal in accordance with its waste profile.
N-29			In Section 3.9 Stockpile Management and Characteristic Sampling, page 3-13, line 1 the Permittee states “[results] will be compared to the contaminants listed in 40 CFR 261.31-33 as being characteristically toxic to determine if the potential exists for the soil to be hazardous.” This statement incorrectly references to 40 CFR 261.31-33, which presents listed wastes instead of 40 CFR 261.20-24 which refers to characteristic wastes. Correct this typographical error in the revised Work Plan.		“40 CFR 261.31-33” will be changed to “40 CFR 261.20-24”
N-30			In Section 3.9.1 Stockpile Sampling Method, page 3-13, line 17 the Permittee states “[o]ne sample will be collected from each 250 cubic yard stockpile...” and on line 22 states “[o]ne composite soil sample will be collected from five locations in each pile.” Samples must be comprised of a composite of 10 subsamples; five subsamples must be collected within		The sentence will be replaced with the following text: “One composite sample will be collected from 10 subsample locations within each 250 cubic yard stockpile. Five subsample locations will be collected from the first 125 cubic yards of material deposited from the conveyor and five subsamples will be collected from the second 125 cubic yards deposited

			the first half of the stockpile deposited from the conveyor and five subsamples must be collected from the last half of the stockpile deposited from the conveyor. Samples must be collected one to two feet below the surface of the stockpile.		from the conveyor. The subsamples will be collected one to two feet below the surface of the stockpile.”
N-31			In Section 3.10 MD Flashing Process, page 3-13, line 28, the Permittee states “[a]ll MD that is generated during the separation process will be flashed in accordance with SOP No. 15.” Although line 16 of the first page of Appendix I (Field Standard Operating Procedures) lists SOP No. 15 (Flashing of MD), it is not included in the appendix. Communications with USACE (conference call with Steve Smith and Eric Kirwan of USACE and & NMED on 6/22/12) indicated that this SOP has not been written yet. The revised Work Plan must include the site specific details regarding selection of materials for flashing, the treatment unit, operation of the unit, estimated soak times, segregation of treated and untreated MD, and management and disposal of any residues associated with the MD flashing process including emissions from the flashing unit (see Comment 46).		The Permittee is currently considering available options for executing the flashing process and the SOP is dependent on the selected vendor to provide the equipment/service. After verbal discussions with the NMED via teleconference on October 2, 2012 and in response to Comment 31, Section 3.10 of the Work Plan will be revised to include more detailed descriptions of the of the flashing unit and process. SOP No. 15 will be removed from Appendix I.
N-32			In Section 3.11 [Material Potentially Presenting an Explosive Hazard] MPPEH Inspection Process, page 3-15, line 13, the Permittee states “...processing MPPEH for certification		MPPEH is not certified as MD or RRD. The sentence will be changed to state: “The SUXOS will ensure the specific procedures and responsibilities for processing

			as MD or RRD [as] specified in the WP...” A brief description of the process for certifying MPPEH as MD or RD was not found in the Work Plan. Provide the location(s) of the MD certification process(es), including the applicable portions of all cited reference documents as an appendix in the electronic copy of the revised Work Plan.		MPPEH for certification as MDAS are being followed.” Publications that describe the MPPEH procedures are DoDI 4140.62 and EM1110-1-4009, Chapter 14. These are not applicable appendices to a Military Munitions Response Program Work Plan Recommend that the publications be provided to the NMED separately for reference.
N-33			In Section 3.12 MEC Disposition, page 3-16, line 31 the Permittee states “[d]onor explosives, consisting of jet perforators or pentolite boosters, will be obtained from an explosives vendor and stored in two ECMs located on Explosive Storage Block B.” According to FWDAs latest submittal of Quarterly Inventory and Inspection Reports for Igloo Block B, dated June, 18, 2012 only one Earth Covered Magazine (ECM) is currently empty. Provide clarification on donor explosives storage logistics in the revised Work Plan.		The following text will be added to the end of the third paragraph of Section 3.13: “In order to ensure that storage space for donor explosives is available, the contents of the ECMs will be managed in accordance with the DDESB-approved ESS.”
N-34			In Section 3.13 CAMU Operation, page 3-17, line 10 the Permittee states “[a]fter construction is complete, baseline soil samples will be collected from the CAMU and analyzed for metals, explosives, perchlorate, total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), semi-volatile compounds (SVOCs), nitrate, cyanide, polychlorinated		The last sentence of the first paragraph of Section 3.13 will be revised to state the following: “...from the CAMU and analyzed for metals, explosives, perchlorate, total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), semi-volatile compounds (SVOCs), nitrate, cyanide, polychlorinated biphenyls (PCBs), dioxins, furans

			biphenyls (PCBs), dioxins, and furans.” In the revised Work Plan, state samples will be analyzed for diesel range organics (DRO), oil range organics (ORO) and target analyte list (TAL) metals in accordance with IX.L of the FWDA Permit Modification (Permit) dated June 27, 2011.		diesel range organics (DRO), oil range organics (ORO), and target analyte list (TAL) metals in accordance with IX.L of the FWDA RCRA Permit Modification dated June 27, 2011.”
N-35			In Section 3.13 CAMU Operation, page 3-17, line 26 the Permittee states “[w]astes generated during CAMU operations will be characterize[d] prior to disposal. Waste requiring characterization will include ash from burn activities and soils that may have been impacted during CAMU operation. A sample will be collected to develop a waste profile for each waste stream... [c]hemical analysis will include [toxicity characteristic leaching procedure] TCLP and totals analysis will be collected for barium, chromium, lead, mercury, and 2,4-dinitrotoluene.” To develop adequate waste stream profiles, a larger analyte suite is necessary. In the revised Work Plan, add the following chemical analyses: TCLP semi-volatiles (full list), TAL metals, and dioxins and furans. The revised Work Plan must also list all analytical methods that will be used to develop waste profiles.		The last sentence of Section 3.13 will be revised to state the following: “Chemical analysis will include TCLP and total analysis for barium, cadmium, chromium, lead, mercury 2,4-dinitrotoluene, TCLP SVOCs, dioxins, furans, and TAL metals.”
N-36			In Section 3.14.1 Instrument Verification Strip [IVS], page 3-17, line 10 the Permittee states “[t]he IVS will be composed of two linear tracks 35 meters in length. Nine industry		“The IVS will be composed of two linear tracks 35 meters in length. Six industry standard objectives (ISOs) or inert munitions simulants with known characteristic responses will

			standard objectives (ISOs) or inert munitions stimulants with known characteristic responses will be aligned and buried in the first track, no closer than 5 meters apart...” It is not possible to fit nine ISOs, no less than 5 meters apart, within a linear track of 35 meters. Correct this statement in the revised Work Plan.		be aligned and buried in the first track, no closer than 5 meters apart...”
N-37			In Section 3.15.2.1 Standard Data Processing and Target Selection, page 3-23, line 1 the Permittee states “[t]he locations of known cultural features recorded during the survey will be plotted on the same map. Anomalies that are in close proximity to those features will be masked and excluded from target selection.” From the information provided, it is unclear if an evaluation will be made to determine if these anomalies pose potential environmental or explosive threat, and if so, whether subsequent actions will be indicated (e.g., removal actions, notifying tribal representatives). Provide clarification and more detail in the revised Work Plan.		As described in the Cultural Resources Management Plan, written in consultation with the Zuni Cultural Resource Enterprise, there are not any properties listed in or eligible for the National Register located within the HWMU and a survey will not be completed as it is not possible to safely conduct further cultural resource inventory or archeological testing within the HWMU. As a result no anomalies will be excluded from target selection due to known or the discovery of cultural features. Notifications, documentation, removal, and handling of any inadvertent discoveries during the work will be completed in accordance with the Cultural Resources Management Plan. The bullet will be removed from the text.
N-38			In Section 3.16 Confirmation Soil Sampling, page 3-27, line 4 the Permittee states “[i]n accordance with 7.3 of Attachment 7 of the RCRA Permit, the Army may elect to propose an alternate land use scenario and associated cleanup goals for the site.”		Comment noted.

		<p>NMED is not inclined to accept less stringent cleanup levels than the residential land use scenario since the site may ultimately be returned to tribal trust.</p>		
<p>N-39</p>		<p>In Section 3.16.1 Confirmation Soil Sampling Method, page 3-27, line 21 the Permittee states “[s]amples will be collected from the bottom and sidewalls of each excavation of CDC and CRP. Each CDC and CRP will have one sample from each sidewall (north, south, east, and west) and the bottom. Samples will be collected laterally every 150 feet of sidewall and from the bottom for every 150 feet by 150 feet area.” Some CDCs and CRPs are smaller than 150 feet by 150 feet area (i.e., CDC8 is approximately 60 feet by 60 feet according to Figure 3-7, Anticipated Sampling Plan, Fort Wingate Depot Activity, McKinley County, New Mexico).</p> <p>The sidewalls of each excavation must be sampled at a frequency of one sample for every 50 feet of sidewall or at a minimum of one sample for every sidewall that is less than 50 feet long. For sidewalls where excavation depths are greater than 20 feet below ground surface (bgs), one vertical sidewall sample must be taken for each 10 feet of depth bgs. For example, a sidewall for a 21 ft deep excavation must have two samples collected for every 50 feet of sidewall, at two different</p>		<p>Per the follow-on phone conversation with the NMED on November 6, 2012, composite samples will be collected from every 100 feet of excavation side wall. If there are any excavations deeper than 20 feet, one composite sample will be collected for every 10 feet of depth every 100 feet of sidewall.</p> <p>A composite sample will be collected from the bottom of every excavation that is smaller than 100 feet by 100 feet (10,000 square feet) and one composite sample will be collected from the every 100 feet by 100 feet (10,000 square feet) of excavation bottom for excavations larger than 100 feet by 100 feet). The composite samples will be comprised of nine subsamples for areas smaller than 100 feet by 100 feet. The composite samples will be comprised of 30 subsamples for areas larger than 100 feet by 100 feet.</p> <p>The section will be revised to denote the sampling area and logic as well as further describe how the samples will be collected.</p>

			<p>depths.</p> <p>In addition, a composite sample comprised of nine subsamples is sufficient for confirmation sampling at the bottoms of CDC and CRP excavations in smaller excavation areas (i.e., 60 feet by 60 feet), however multi-incremental (MI) sampling is required for larger excavation bottoms using a minimum of 30 incremental samples. Modify the confirmation soil sampling method section in the revised Work Plan.</p>		
N-40			<p>In Section 3.16.1 Confirmation Soil Sampling Method, page 3-27, line 24 the Permittee states “[t]he remainder of the site will be divided into grids approximately 150 feet by 150 feet [22,500 square feet (half acre)] and a sample will be collected within each grid. See Figure 3-7 for composite sample layout.” It is unclear from the text if the sample taken within each grid will be a composite or discrete sample, and how many subsamples will be in the composite sample. Figure 3-7 indicates there will be nine subsamples within each single grid composite sample. All samples for grids greater than 6,500 square feet must be a comprised of 30 subsamples, for grids less than 6,500 square feet, nine subsamples per grid is sufficient. Clarify the confirmation sampling information in the text of the revised Work Plan.</p>		<p>This section will be revised to reflect the follow on discussion with NMED on November 6, 2012. Included in the revision, a more detailed description of the sample locations and composite sample collection method and requisite number of subsamples.</p>

N-41		From the information presented on Figure 3-7, Anticipated Sampling Plan, Fort Wingate Depot Activity, McKinley County, New Mexico it is unclear which areas will be excavated and sampled. Identify anticipated excavation limits and sampling locations for all areas must be added (e.g., extent of subsurface waste, area of shallow waste, other areas of potential subsurface debris, arroyo) as well as approximate anticipated excavation boundaries and sampling locations within CRPs and CDCs, on Figure 3-7 in the revised Work Plan.		Figure 3-7 will be revised to show the anticipated sampling locations as reflected in the responses to Comments 39 and 40.
N-42		Section 3.17 Groundwater Monitoring Well Abandonment, page 3-28, line 2, details associated with monitoring well abandonment (e.g., number of wells, well identification numbers, copies of plugging record for each well (as submitted to the New Mexico Office of the State Engineer)) must be included in the Report. The revised Work Plan must indicate whether or not the groundwater monitoring wells will be replaced, and if so, propose an approximate time frame for their replacement.		The following text will be added to the end of the first paragraph of Section 3.17: “Well plugging records will be included in an appendix to the Removal Report. Plugged monitoring wells may be replaced as part of the groundwater investigation in accordance with Section VI of the Permit beginning after closure of the HWMU under Permit Section III.A. Well replacement will occur in approximately 2019.”
N-43		In Section 3.18.2 Vegetation, page 3-28, line 28 the Permittee states “[a] seed mixture, consisting of drought tolerant species native to northwest New Mexico will be placed in areas disturbed by the removal activities...Prior to revegetation, coordination with McKinley County		After consulting with the McKinley County Extension office, they indicated that buffalo grass and blue grama would be native seeds appropriate for the restoration effort. The sentence will be revised to state: “A seed mixture, consisting of drought tolerant species native to

			Extension Office will be completed to verify the most appropriate reseeding times.” In the revised Work Plan, provide a list of the plant species to be planted in HWMU after removal activities.		northwest New Mexico, such as blue grama and buffalo grass, will be placed in areas disturbed by the removal activities...”
N-44			Section 3.18.2 Vegetation, page 3-29, line 1 states “[a]ny wetland area’s identified during the environmental resources inventory will undergo wetland mitigation in accordance with the wetlands mitigation plan and the USACE 404 permit.” The Permittee must provide documentation in the Report that all State and Federal restoration requirements were met in accordance with Section I.C (Effect of Permit), of FWDA’s RCRA Permit.		Comment noted.
N-45			In Section 3.19.2 [Investigation-derived Waste] IDW, page 3-29, line 30 the Permittee states “[d]econtamination water will be containerized in drums or tanks...A characterization sample will be collected from each container sent to [the laboratory] for chemical analysis of those constituents required by the disposal facility.” In the revised Work Plan, add the following analyses, if not already required by the disposal facility, SVOCs, explosives, PCBs, dioxins, furans, and RCRA 8 metals.		The text will be revised to state the following: “A characterization sample will be collected from each container and sent to APPL for chemical analysis for those constituents required by the disposal facility as well as SVOCs, explosives, PCBs, dioxins, furans, and RCRA 8 metals.”
N-46			In Section 3.19.3 Recyclable Material, page 3-30, line 7 the Permittee states “[t]he voluntary flashing process is not considered treatment and therefore no wastes requiring management are		Please see response to Comment 31. The changes incorporated into the Work Plan from Comment 31 will include that the NMED Air Quality Bureau concurs that the work

			<p>anticipated from the flashing process.” It is unclear if the flashing process will produce emissions. Describe the flashing process in the revised Work Plan and explain why the flashing process is not considered treatment. The revised Work Plan must also state whether or not a permit from NMEDs Air Quality Bureau is necessary for the flashing unit (see Comment 31).</p>		<p>qualifies for an exemption 20 NMAC, Chapter 2, Part 72, Section 72.202.A(5).</p>
N-47			<p>In Section 3.19.4 Hazardous Waste Plan, page 3-30, line 15 the Permittee states “[t]he waste will be transported...to Clean Harbors or other facility permitted to accept and treat hazardous waste.” The Permittee must keep copies of waste disposal information (e.g., waste manifests) on file at the FWDA information repository as well as include electronic copies of the waste manifests in an appendix of the Report.</p>		<p>The following text will be added to the end of the Section 3.19.4: “Waste disposal documentation (e.g. waste manifests) will be kept on file at the FWDA information repository as will be included as an appendix to the Removal Report.”</p>
N-48			<p>The location of the CAMU is not depicted on Figure 3-1 Anticipated Haul and Evacuation Routes, Fort Wingate Depot Activity, McKinley County, New Mexico. Add the location of the CAMU to Figure 3-1 in the revised Work Plan.</p>		<p>The location of the CAMU will be identified on Figure 3-1.</p>
N-49			<p>In Section 4.5 Visitor Documentation NMED and USEPA are not listed as authorized visitors to the site. In the revised Work Plan edit Section 4.5 to include NMED and USEPA as authorized visitors.</p>		<p>The paragraph is not intended to identify all parties who might enter the HWMU, but instead to identify those who are authorized to visit the site for project or mission related functions. EM 385-1-97 defines authorized visitors as DoD, DA, USACE, or other personnel (EM CX,</p>

					<p>DDESB, HQ Safety, etc.) conducting project or mission related functions, such as Quality Assurance Representatives (QARs), safety and quality inspectors (including geophysicists performing quality assurance functions), and project management.</p> <p>The NMED and USEPA will not be conducting project or mission related functions as defined in EM 385-1-97 and are not considered authorized visitors by its definition.</p> <p>The Army and its contractor recognize the NMED and USEPA will need to conduct site visits and will be provided opportunities to do so during down times, for safety. Recommend no changes be made to the text.</p>
N-50			In the revised Work Plan, add “Site Restoration” and its associated “Inspection/Surveillance Points” needs to be added to Table 4-1 Definable Features of Work and QC Actions, Fort Wingate Depot Activity, McKinley County, New Mexico as a “Definable Feature of Work”.		The Quality Control Plan presented in Section 4 of the Work Plan is specific to conducting quality control of MEC-related activities only. Recommend that no changes be made to Table 4-1.
N-51			In Section 4.13.2 Resolution, Corrective Action, and Verification, page 4-14, line 10 the Permittee States “[t]he [Nonconformance Report] NCR log will be used to track and control each non conforming condition...[and]...will be maintained		A sentence will be added to the end of the second paragraph of Section 4.13.2 that states: “Copies of the NCR log will be included as an Appendix to the Removal Report.”

			in the project files and available on-site.” In the revised Work Plan state that the NCR log will be included as an Appendix in the Report.		
N-52			In accordance with Section I.C Effect of Permit, of the FWDA RCRA Permit, Section 6 Environmental Protection of the Work Plan must be amended to include reducing adverse impacts to the environment that may occur as a result of field activities (e.g., potential ponding of water, potential flooding).		The following bullets will be added to Section 6.2: <ul style="list-style-type: none"> • Except for open excavations, disturbed areas will be graded to provide positive drainage and minimize the potential for ponded water. • Grading and excavation within the arroyo will be completed so as not to restrict the channel and create the potential for upstream flooding. The channel will remain clear and open.
N-53			Section 6.1.5.2 Groundwater, page 6-5, line 17 is a very basic summary of groundwater for the entire FWDA facility and refers primarily to the Administration Area at FWDA. In the revised Work Plan, include a discussion of the specific hydrogeologic conditions within the HWMU, including depth(s) to the water table, and Sonsela sandstone, which outcrops in Parcel 3.		Per our discussions with the NMED on October 2, 2012, due to the small number of wells located within the HWMU, several of which are dry, it is currently difficult to accurately detail the groundwater conditions at the HWMU. However, the information in the Final Closure Plan Phase I Work Plan will be summarized in Section 6.1.5.2.
N-54			Section 6.1.7 Cultural and Archaeological Resources, page 6-5, line 33 “[t]he Fenced Up-Horse Canyon is located on a ridge top...” This appears to be an inaccurate		The resource cites that The Fenced-Up Horse Canyon is located on a ridge top. The sentence will be changed to state: “The Fenced-Up Horse Canyon contains the highest

			statement. Review documentation and make corrections as necessary in the revised Work Plan.		frequency of pueblo sites.”
N-55			Section 6.2 Mitigation Procedures, page 6-6, line 35 states “[t]he delineation report would include a mitigation plan which will detail avoidance and minimization measures related to jurisdictional wetlands.” The Permittee must include an electronic copy of the wetlands delineation report as a reference document in the Report.		Comment noted, the Wetlands Delineation Report will be included as a reference document to the Removal Report.
N-56			In Section 6.2 Mitigation Procedures, page 6-7, line 24 the Permittee states “[t]he cultural resource monitoring is detailed in Section 3.21.” Cultural resource monitoring is covered in Section 3.20. Correct this typographical error in the revised Work Plan.		The sentence will be revised to state: “The cultural resource monitoring is detailed in Section 3.20.”
N-57			In Section 6.2 Mitigation Procedures, page 6-7, line 33 the Permittee states “MEC items disposition is detailed in Section 3.13 [MEC Disposition].” This is incorrect, Section 3.12 covers MEC disposition. Section 3.13 covers CAMU operation. Correct this typographical error in the revised Work Plan.		The sentence will be revised to state: “MEC items disposition is detailed in Section 3.12.”
N-58			In Section 6.2 Mitigation Procedures, page 6-7, line 33 the Permittee states “MD and other metallic debris disposition are detailed in Sections 3.12 [MEC disposition] and 3.20 [Cultural Resources Monitoring].” This is incorrect, Section 3.20 covers		The sentence will be revised to state: “MD and other metallic debris disposition are detailed in Sections 3.12 and 3.19.3.”

			cultural resource monitoring. It is unclear which section the Permittee meant to reference. Revise the Work Plan accordingly.	
N-59			In Section 6.2 Mitigation Procedures, page 6-8, line 15 the Permittee states “IDW generated during the FWDA field activities will be disposed of as described in Section 3.” Section 3.20 covers cultural resources monitoring and Section 3.19 covers IDW. Correct this typographical error in the revised Work Plan.	The sentence will be revised to state: “IDW generated during the FWDA field activities will be disposed of as described in Section 3.19.”
N-60			In Appendix I, Field Standard Operating Procedures, SOP No. 14 Open Burning, Section 14.3 Open Burning Procedures, page 14-3, first bullet the Permittee states “[i]f the burn is declared complete...the burn pad and immediate area may be wetted with generous amounts of water.” Section IX.G.3 Open Burning (OB) of the Permit states “...no cool down procedures (e.g., drenching with water) shall be used, except in an emergency.” Revise the open burning procedures to be in accordance with the Permit requirements.	The following changes will be made to the SOP No 14: The second bullet of Section 14.2 will be deleted. The first bullet of Section 14.3 will be deleted. The last sentence of the second paragraph of Section 14.3 will be revised to state: “The electric or nonelectric initiation system will be prepared in accordance with 60A-1-1-31. The second to last bullet in Section 14.3 will be revised to state: “• If burn is declared complete and area is declared safe by the Disposal Team Leader, operations at the CAMU may resume.”.
N-61			In Appendix I, Field Standard Operating Procedures, SOP No. 14 Open Burning, Section 14.3 Open Burning Procedures, page 14-3, second bullet the Permittee states	The last bullet in Section 14.3 will be deleted and replaced with the following text: “A single burn pan will be used to conduct open burns. Successive burns shall not be

			<p>“...successive burns can begin at burn pads 50 feet upwind from previous burns, provided that the previously used pad has been watered or 4 hours has elapsed.” Section IX.G.3 Open Burning (OB) of the Permit states “[w]hen a burn treatment is required... a single burn pan shall be employed.” Furthermore, Section IX.B.3 Burn Pan Design outlines the requirements for constructing the burn pans. The use of a burn pad is not allowed for OB treatment at the CAMU. Revise the Work Plan to be in accordance with the conditions specified in FWDAs RCRA Permit (see also Comment 61).</p>		<p>conducted in the same day.”</p>
N-62			<p>In Appendix I, SOP No. 14, Section 14.3 Open Burn Procedures, page 14-3, line 1 the Permittee states “[i]f the burn is declared complete and area is declared safe by the Disposal Team Leader, the burn pad and immediate surrounding area may be wetted with generous amounts of water.” Watering down burned material is prohibited, as stated in Section IX.G.3 Open Burning (OB) of Permit “...no cool down procedures (e.g., drenching with water) shall be used, except in an emergency.” Revise Appendix I, Section 14 of the Work Plan to comply with the Permit.</p>		<p>Please see response to Comments 60 and 61.</p>
N-63			<p>The Work Plan does not provide the CAMU burn pan design. The burn pan must follow specifications outlined in Section IX.B.3 Burn Pan Design of the</p>		<p>The burn pan design will be included in an appendix to the Work Plan.</p>

			Permit. Provide details of Burn Pan Design in the revised Work Plan.		
N-64			The Work Plan does not provide information regarding recordkeeping procedures for the CAMU. Recordkeeping, at a minimum, must comply with IX.M Recordkeeping for the Treatment Operations of the Permit. Provide details of recordkeeping procedures for the CAMU in the revised Work Plan.		The following text will be added after the fourth paragraph of Section 3.13: "Recordkeeping during operation of the CAMU will comply with Section IX.M of the FWDA RCRA Permit. A logbook will be maintained documenting the following information after each open burn or demolition shot; volume and type of munitions destroyed, method of destruction, type and volume of ignition source, estimated volume of any incidental solid waste destroyed and reason it could not be separated from the WMM, and date and time of the operation. The logbook will also include descriptions of any maintenance activities completed at the CAMU."

**TRIBAL DRAFT FORT WINGATE REMOVAL WORK PLAN, HWMU, PARCEL 3,
AT THE FORT WINGATE DEPOT ACTIVITY, MCKINLEY COUNTY, NM
COMMENT RESPONSE TABLE
SEPTEMBER 9, 2011**

Comment Number	Page No. Line No.	New Page or Sheet	Comment	Recommendation	Response
<i>Pueblo of Zuni, Division of Natural Resources (Stephen Beran, Kirk Bemis, Nelson Luna)</i>					
A-1	2-1 15 and 16		"Program Manager" is referenced twice.	Remove one reference to "Program Manager."	Agree. One reference to Program Manager will be deleted.
A-2	3-4 1 through 29		The Section paragraphs are not numbered correctly.	Renumber paragraphs on Page No. 3-4.	Agree. The paragraph numbers will be corrected.
A-3	3-4 Section 3.4.1, 10 to 19		Obtain required NMED air permits for CAMU open burning and flashing operations.	Identify air permitting requirements and incorporate specific tasks within the Work Plan, and identify position responsible for administering the air permit(s).	During the RCRA Permit Modification process, the NMED Air Quality Bureau was consulted, and concluded that the CAMU would not produce emissions that exceed the thresholds in NMAC 20.2.72 and an Air Permit is not required. The Air Quality Bureau determined that the CAMU may require a Notice of Intent under MNAC 20.2.73.200. The following text will be added as another bullet after line 8 on Page 3-4, "Identify and obtain the required permits/notifications to complete the work (i.e. NPDES, Air NOI, etc)."
A-4	3-4 Section 3.4.1, 21 to 24		SWPPP should address on-site fuel storage and refueling if not addressed elsewhere in the Work Plan.	Provisions for spill containment and response should be addressed by the SWPPP or other Work Plan component.	Agree. The SWPPP will provide provisions for material handling and spill response. No changes will be made to the text.
A-5	3-8 through 3-13		Soil and debris handling including grizzly feeder screens, and hammer mill operations described in Section 3.8 may produce fugitive dusts requiring dust suppression and on-site	3.8 Debris and Soils Processing operations described are likely to produce dust emissions. The Work Plan should have provisions to determine compliance with the CAA	The following text will replace the bullet starting on Line 19 on page 6-8: "It is anticipated that planned activities will generate fugitive dust emissions as well as vehicle

			monitoring.	opacity limits and contingencies to institute dust suppression controls as needed.	emissions associated with equipment. Area ambient air will be periodically monitored in real time at the nearest downwind receptor or at the parcel boundary by visual assessment, or using a MSE pDR-100 (or equivalent). If measurements exceed 1.0 mg/m ³ at the monitoring point then dust control measures will be implemented at the source to limit the generation of dust to the extent possible. Source implementation measures include wetting down roads or equipment. Haul roads within the work area will be maintained to reduce dust generation.”
A-6	3-11 and 3-12		The NMED Air Quality Bureau permit type and requirements are not identified. Permit conditions may require attention to wind speed, hours of operation, inversions, etc.	At a minimum, the permit type should be identified in the Work Plan and the position responsible for obtaining and administering the permit should be reported in the Work Plan. There is a potential that Section 3.10 Flashing Process will require permitting. The Work Plan should identify the position having permitting and project responsibility.	Please see response to Comment A-3.
A-7	3-13	Section 3.8.7	SOP No. 16 is not completed and is not referenced in the Table of Contents.	SOP No. 16 should be completed and incorporated into the Work Plan.	The text in Section 3.10 is incorrect. The reference will be changed to SOP No. 15. However; SOP 15 is still under development as different methods of executing the flashing process are explored. SOP No. 15 will be developed and submitted for review at a later date. Once review comments have been resolved, SOP No. 15 will be incorporated into the Work Plan.
A-8	6-8	Section 3.10, 28 and 29	The Work Plan reports that fugitive dust emissions are anticipated.	See Comment No. 6 recommendations. Plans for fugitive dust emissions field measurements	Please see response to Comment A-5.

	19 through 24			and contingencies for implementing dust suppression controls should be addressed in the Work Plan.	
A-9	3-13		The Work Plan does not report how fuel storage and refueling, spill prevention, and response will be managed during the project.	Report how spill prevention and response will be managed during the project (e.g., SWPPP, SOP).	Please see response to comment A-4.
A-10	3-13		The Work Plan does not identify the position responsible for reporting spills for RQs and contamination to surface waters.	Identify the regulatory requirements and individual who will report spills to NMED and/or EPA.	The text on line 32 of page 6-8 will be changed to read the following: "...during field activities; however, if a fuel spill were to occur in such quantity as may with reasonable probability injure or be detrimental to human health or the environment, the operating contractor will contain the spill and contact the COR. The owner, operator or person-in-charge of FWDA will report the spill to the NMED by calling (866) 428-6535 in non-emergencies or calling (505) 827-9329 for emergencies".
	30 through				
A-11	3-29		Operation of the MD Flashing Process unit may require decontamination and disposal of regulated wastes.	The Work Plan should report MD Flashing Process decontamination procedures, waste determinations, and waste disposal management as applicable. If these are not concerns, the Work Plan should report this.	The flashing process is incorporated as a voluntary process. Flashing will be completed on material that has been inspected and already deemed free of explosive material. Generation of wastes as a result of this process is not anticipated. The following sentence will be added after the 3 rd sentence of Section 3.19.3. "The voluntary flashing process is not considered treatment and therefore no wastes requiring management are anticipated from the flashing process. All treatment will be performed in the CAMU."
	Section 3.19				
A-12	6-6		Mitigation procedures for the MD Flashing Process are not reported.	Report mitigation procedures for the MD Flashing Process as needed for decontamination, waste determinations, and management of	Please see response to Comment A-11.

	Section 6.2			regulated wastes.	
A-13	6-8 9 and 10		Work Plan text references Section 3.20 for hazardous waste issues.	Section 3.20 applies to Cultural Resources Monitoring. Section 3 tables which follow Section 3.20 apply to regulated wastes. Tables should be accurately referenced and incorporated into the Work Plan.	The reference to Section 3.20 on line 10 will be changed to 3.19. The table does appear to be accurately referenced in the Work Plan.
A-14	6-8 19 through 24		The Work Plan reports that fugitive dust emissions are anticipated.	See Comment No.'s 5 and 6 recommendations. Plans for fugitive dust emissions field measurements and contingencies for implementing dust suppression controls should be addressed in the Work Plan.	Please see response to comment A-5.
A-15	6-8 27 through 34		The Work Plan does not identify the regulatory requirements for managing fuels and spill reporting; and, position responsible for project oversight and reporting.	Identify the regulatory requirements and individual who will report spills to NMED and/or EPA.	Please see response to comment A-10.
A-16	iii Appendix I Table of Contents		SOP No. 15 Thermal Treatment of MD should be identified in the Table of Contents.	Correct Table of Contents.	Please see response to Comment A-7. SOP 15 has been renamed to "Flashing of MD". The TOC will reflect the change.
A-17	15-1 Appendix I		SOP No. 15 Thermal Treatment of MD is not completed.	Complete SOP No. 15.	Please see response to Comment A-7.



NEW MEXICO
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BUTCH TONGATE
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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 24, 2013

Mark Patterson
 BRAC Coordinator
 Ravenna Army Ammunition Plan
 Building 1037
 8451 State Route 5
 Ravenna, OH 44266

Steve Smith
 USACE
 CESWF-PER-DD
 819 Taylor Street, Room 3B06
 PO Box 17300
 Fort Worth, TX 76102-0300

**RE: APPROVAL WITH MODIFICATIONS
 FINAL REMOVAL WORKPLAN, HWMU, PARCEL 3, REVISION 1
 DECEMBER 19, 2012
 FORT WINGATE DEPOT ACTIVITY, NEW MEXICO
 EPA ID# NM6213820974
 HWB-FWDA-11-013**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) has received Fort Wingate Depot Activity's (Permittee) *Final Removal Work Plan, HWMU, Parcel 3, Revision 1, December 19, 2012*, (Work Plan) dated December 2012 and received on December 21, 2012. NMED reviewed the Work Plan and hereby issues this Approval with Modifications. The comments below reference NMED's August 16, 2012 *Disapproval* (NOD).

Comments

- NOD Comment 4**
 The Permittee updated the Soil Screening Level values in Table 3-2, but did not change the footnote referencing NMED 2009 Soil Screening Levels to which Comment 4

referred. Correct the footnote and submit a replacement page referencing the NMED 2012 Soil Screening Levels.

2. NOD Comment 6

The Permittee did not spell out the abbreviations or acronyms referenced in this comment upon first use or add them to the list of abbreviations in the work plan. The Permittee must spell out the abbreviation or acronym at first use and update the list in the work plan to include missing abbreviations or acronyms. Submit replacement pages in order to correct this issue in the Work Plan.

3. NOD Comment 32

The Permittee must provide NMED copies of all documents detailing procedures used to accomplish work under this Work Plan, including, but not limited to, DoDI4140.62 and EM1110-1-4009, Chapter 14.

4. NOD Comment 39

In the revised Section 3.16.1, Confirmation Soil Sampling Method, the Permittee states, "The remainder of the site will be divided into grids approximately 150 feet by 150 feet and a composite sample will be collected from within each grid." The grid size for the remainder of the site must be no larger than 100 feet by 100 feet. This grid spacing will approximate a quarter acre and provide 4 composite samples per acre. Submit replacement pages for text and figures to correct this issue.

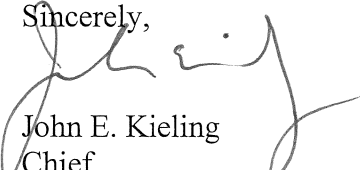
5. NOD Comment 55

In order to maintain continuity and completeness within one document, the Permittee must insert a statement in Section 6.2 detailing the inclusion of the Wetlands Delineation Report as a reference document to the Removal Report. Provide a replacement page or pages to correct this issue.

The Permittee must address all comments in this Approval with Modifications and submit the required replacement pages. The replacement pages must be accompanied with a response letter that details where all revisions have been made, cross-referencing NMED's numbered comments. In addition, an electronic version of the entire revised Work Plan incorporating the replacement pages must be submitted. The response letter, replacement pages, and electronic version of the complete final plan must be submitted to NMED no later than **February 28, 2013**.

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

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
N. Dhawan, NMED HWB
B. Wear, NMED HWB
C. Esler, USACE
L. King, U.S. EPA Region 6
C. Hendrickson, U.S. EPA Region 6
T. Perry, Navajo Nation
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J. John, Navajo Nation
E. Quintana,
S. Beran, Zuni Pueblo
D. Tsabetsaye, Zuni Pueblo
K. Bemis, Zuni Pueblo
C. Seoutewa, Southwest Region BIA
R. Duwyenie, Navajo BIA
J. Wilson, BIA
E. Stevens, BIA
B. Burshia, BIA

File: FWDA 2013 and Reading
FWDA-11-13