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Certified Mail - Return Receipt Requested

June 6, 2022

George H. Cushman
Headquarters, Department of the Army
Office of the DCS, G-9
Army Environmental Office, Room 5C140
600 Army Pentagon
Washington, DC 20310-0600

**RE: [RESPONSE TO] APPROVAL WITH MODIFICATIONS
FINAL REVISION 2 INTERIM MEASURES COMPLETION REPORT
PARCEL 21 – SOLID WASTE MANAGEMENT UNIT 1 – TNT LEACHING BEDS
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-19-006**

Dear Mr. Cushman,

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *[Response to] Approval with Modifications, Final Revision 2 Interim Measures Completion Report, Parcel 21- Solid Waste Management Unit 1-TNT Leaching Beds* (Response), dated April 4, 2022. NMED has reviewed the Response and hereby issues the following comments.

Comments

1. Permittee's Response to NMED's Approval with Modifications Comment 1, dated April 4, 2022

Permittee Statement: "A column identifying SL-SSLs has been added to Tables 5-24 and 5-25, and exceedances are identified by shading. In addition, Figure 4-1 has been revised to indicate that Area 1 and Area 2 decision units (all) exhibit exceedances of [soil leachate-based soil screening levels (SL-SSLs)]. Tables 5-24 (Figures pages 210 – 212) and 5-25 (Figures pages 213 – 214) have been replaced with the updated tables (same page

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numbers). In addition, Figure 4-1 (Figures page 11) has been replaced with the updated Figure 4-1.”

NMED Comment: Several issues were identified in Tables 5-24 and 5-25 and Figure 4-1. Address the following issues:

- a) The RDX concentrations in the soil samples collected from Soil Stockpile Area 1 and 2 range from 2.12 to 6.05 mg/kg, and from 1.59 to 3.77 J mg/kg, respectively, according to Tables 5-24 and 5-25. The RDX concentrations in all soil samples collected from Soil Stockpile Area 1 and 2 remain significantly above SL-SSL of 0.06 mg/kg. Since the groundwater beneath SWMU 1 is already contaminated with RDX, installation of a geotextile membrane will not provide additional groundwater protection. However, RDX contamination may spread from the area via wind or surface water runoff because contaminated soils remain. Propose to submit a work plan to remediate the soils that contain RDX concentrations above SL-SSL or propose to provide a preventative measure to contain the contaminated soils from spreading over the site (e.g., berm, cover) in a response letter, as appropriate. Otherwise, explain why remediation or preventative measures are unnecessary in a response letter.
- b) Tables 5-24 and 5-25 do not identify non-detection (ND) values that exceed SL-SSLs as data quality exceptions. For example, the nitroglycerin concentration in the soil sample designated as 2101B-AC02-0002-I-SO-C is reported as 0.1 U mg/kg, which is ten times greater than the SL-SSL of 0.01 mg/kg. The ND exceedance is not identified in the tables or discussed in the Report. ND results with reporting limit (RL) values exceeding their respective screening levels must be considered as a data quality exception and must be identified as such in all applicable sections, tables, and figures of the Report. Revise the Report accordingly and provide replacement pages.
- c) A footnote of Tables 5-24 and 5-25 states, “[q]ualifier U - the compound was analyzed but not detected.” It is not clear whether the compound was not detected above reporting limits (RLs), or method detection limits (MDL). All laboratory results that are presented as “not detected (e.g., 0.1 U)” must reference the RL rather than MDL values. Note that MDL applies to the specific laboratory instrument and not to individual samples. Use of the MDL to indicate a value for ND data is not accurate and is a misrepresentation of the data. The Permittee must use the RL rather than MDL value to report undetected analyte concentrations. Revise the tables and provide replacement tables, as applicable.
- d) Figure 4-1 (Pre-Excavation Activities) does not present exceedances of SL-SSLs in Area 1 and Area 2 although each decision unit is identified. Figure 4-1 presents pre-excavation activities and Tables 5-24 and 5-25 present data collected after the soil

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stockpiling activities were completed. Therefore, presenting the data collected from a different timeline in Figure 4-1 is not appropriate. Provide a separate figure depicting the locations of the exceedances identified in Tables 5-24 and 5-25. Provide appropriate replacement pages.

The Permittee must address all comments in this letter and submit an electronic version of the revised Report, a response letter, and replacement tables and figures no later than **October 6, 2022**.

Should you have any questions, please contact Michiya Suzuki of my staff at (505) 690-6930.

Sincerely,

Rick Shean Digitally signed by Rick Shean
Date: 2022.06.06 10:54:52
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Rick Shean
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
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