



REPLY TO  
ATTENTION OF

## DEPARTMENT OF THE ARMY

TOOELE ARMY DEPOT  
TOOELE, UTAH 84074-5000



Environmental Office

Subject: Post-Closure Care Permit

Dr. Robert S. (Stu) Dinwiddie  
Hazardous and Radioactive Materials Bureau  
New Mexico Environment Department  
2044A Galisteo Street  
Santa Fe, NM 87502

Dear Dr. Dinwiddie:

During a recent visit to the New Mexico Environment Department (NMED) offices, inquiries were made regarding the status of the Post-Closure Care Permit (PCCP) application for Fort Wingate Depot Activity (FWDA), New Mexico. I would like to take this opportunity to outline the present status and plan for completing the PCCP application.

As presented at Base Realignment and Closure (BRAC) Cleanup Team (BCT) meetings and at the Peer Review earlier this year, the figure provided as an attachment to this letter summarizes the Department of Army's (DA) understanding of the administrative pathway required for FWDA. Elements of this figure were worked out through extensive discussions with Dr. R. Stewart Dinwiddie at NMED.

The documents listed in the left hand portion of the figure represent the documents which have already been generated or are currently under contract to Program Management Company, Inc. (PMC) for completion for the DA. After discussions with Dr. Dinwiddie, the DA came to understand the items listed in the center column were needed for the PCCP application. Many of these items contain the same information as the documents in the left column but require "repackaging" into the permit application. A RCRA Part A and Part B permit application are items which the DA was originally unaware of the need for but which are now understood to be required as part of the PCCP application.

A regulatory review version of the Final RI/FS Report & RCRA Corrective Action Program Document was submitted to NMED in November 1997. This version does not contain the feasibility study or the risk assessments but completion of those activities

are currently being worked with NMED's active participation. The field programs (Phase IA and IB) for the Open Burning/Open Detonation (OB/OD) Unit have been largely completed and the corresponding reports have been initiated. The DA is programmed to receive funding this fiscal year (FY99) to support completion of the PCCP application. There are several outstanding activities, however, which NMED can greatly assist with and prove pivotal in expediting the application process. These items are summarized as follows:

1. Review of the Final RI/FS Report & RCRA Corrective Action Program Document. Although this document is incomplete, lacking the feasibility study/corrective measures study (FS/CMS) and risk assessments, and will be repackaged into the Base-Wide Plan, review of the existing document would allow the DA to address any major issues now instead of later. The review has huge potential for preventing duplicate work and eliminating rework by communicating any NMED "show stoppers" up front. It would be counterproductive to work all the way to submitting the PCCP application only to discover an NMED issue which could easily be addressed and incorporated into the process now.
2. Establishment of cleanup or closure action levels. This data is critical for evaluation of remedial alternatives in the FS/CMS and for preliminary design work. Without this information there is no objective way to determine quantities of contaminated material which must be dealt with. If the BCT can develop and agree to cleanup levels, the FS/CMS can be conducted and remedial design initiated. If cleanup levels can be established for the TNT leaching beds in the near future, it may be possible to accelerate remedial action funding at that site. The DA understands it is responsible for taking the lead on developing the cleanup levels but guidance and information from NMED is actively solicited and will expedite the process.
3. Risk assessments. A meeting was recently held with all FWDA stakeholders to define and establish a suitable approach for completing the human health and ecological risk assessments at FWDA. Participation from NMED was invaluable and the DA wishes to extend a special thank you to Ms. Kirby Olsen with your organization. An additional meeting is scheduled on 8 December to continue the risk assessment planning process. When all the requirements have been established and an approach identified which the stakeholders believe will result in a successful and satisfactory risk assessment at FWDA, the DA will prepare a risk assessment work plan describing the details of implementing and conducting the risk assessment. NMED's continued participation and input into the risk assessment process will be critical to successful execution of the FWDA risk assessments.

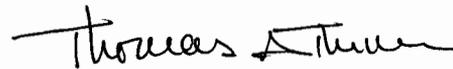
As mentioned previously, FWDA is programmed to receive funding this fiscal year to continue developing the documents which will constitute the PCCP application. As the field investigations are winding down, additional emphasis will be being placed on

preparation of the application. It must be pointed out, however, that several of the key components of the application package, specifically the risk assessments and, to a lesser degree, the FS/CMS, are long lead-time tasks and final completion of these tasks is not expected to occur for some time. The DA can submit portions of the permit application as they become available or can wait and submit it as one complete document or any other construct which best suits the needs of the program. Any suggestions or recommendations from NMED on how best to facilitate the permit application and approval process would be welcomed.

If you have any questions regarding this matter, please do not hesitate to contact Mr. Larry Fisher, at (435) 833-3504.

Encl.

Sincerely,



Thomas A. Turner  
Chief, Environmental Office

cc: w/encl.

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# Post-Closure Care Permit Submittal Process Fort Wingate Depot Activity Gallup, New Mexico

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