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GOVERNOR

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ENVIRONMENT DEPARTMENT
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PETER MAGGIORE
SECRETARY

CERTIFIED MAIL NO. Z 108 891 827
RETURN RECEIPT REQUESTED

February 22, 1999

Mr. Larry D. Fisher
Environmental Engineer
Tooele Army Depot
SDSTE-IRE
Tooele, Utah 84074

**RE: FWDA STORAGE/DISPOSAL OF CHEMICAL WARFARE MATERIAL
EPA ID NO. NMD002208627**

Dear Mr. Fisher:

This letter is written to address both the storage and possible burial of Chemical Warfare Material (CWM) at the Fort Wingate Depot Activity (FWDA).

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau's (HRMB) is aware of the storage at FWDA of 75-millimeter and 155-millimeter "mustard filled" shells. Reference to this statement is made in the FWDA *FINAL REMEDIAL INVESTIGATION/FEASIBILITY STUDY REPORT & RCRA CORRECTIVE ACTION PROGRAM DOCUMENT (RI/FS)*, dated November 15, 1997; page 2-1; Section 2.1; ¶4. The RI/FS further dismisses the subject of CWM storage and possible disposal at FWDA by stating that:

"U.S. Army Technical Escort Unit records state that 45 train car loads of mustard-filled munitions were then shipped from FWDA to the Black Hills Ordnance Depot, South Dakota on March 6, 1949.

HRMB has completed its review of a Draft U.S. ARMY PROGRAM MANAGER FOR CHEMICAL DEMILITARIZATION SURVEY AND ANALYSIS REPORT *SECOND EDITION*, dated December 1996. This document has determined that FWDA has the "potential buried CWM site classification of 4- Possible Burial". HRMB has enclosed a copy

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of the information from this report relative to FWDA for your review.

Upon review of the aforementioned report, HRMB requires that FWDA respond in writing to address the following concerns:

- 1) FWDA will determine which Igloo Blocks/Igloos have stored CWM (i.e., dates, quantities, known releases etc.);
- 2) FWDA will determine if any CWM disposal/burial activities occurred at the installation and if so, when and where; and,
- 3) FWDA will explain why it did not sample for any CWM hazardous constituent(s) (e.g., sulfur) at any of the previous Igloo sampling locations.

FWDA must respond in writing to this request no later than 30 calendar days from its receipt of this letter. Should the return receipt be returned without a date of receipt, FWDA's response is due within 30 calendar days from the date of this letter.

If you have any questions regarding this matter, you may contact Mr. Phillip Solano of my staff at 505/827-1561 ext. 1021.

Sincerely,



Dr. Robert S. (Stu) Dinwiddie, Program Manager
RCRA Permits Management Program
Hazardous and Radioactive Materials Bureau

Enclosure

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cc w/o encls.: Benito J. Garcia, Chief HRMB
Steve Pullen, RPMP/DOD
Ms. Jennifer Parker, GWQB
Ms. Barbara Hoditschek, SWQB
Mr. Jerry Bober, SWB

cc w/ encls.: Mr. Chuck Hendrickson, EPA BCT (6PD-NB)
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, Texas 75202-2733

Mr. David Sinclair
Department of Interior
Bureau of Land Management
1474 Rodeo Road
Santa Fe, New Mexico 87505

Ms. Sharlene Begay-Platero
Industrial Development Representative
Navajo Nation Project Development Department
P.O. Box 663
Window Rock, Arizona 86515

Ms. Roseria Duwyenie
Environmental Protection Assistant
U.S. Department of Interior
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P.O. Box 1060
Gallup, New Mexico 87305

Ms. Arlene Luther
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Hazardous Waste Program
P.O. Box 339
Window Rock, Arizona 86515

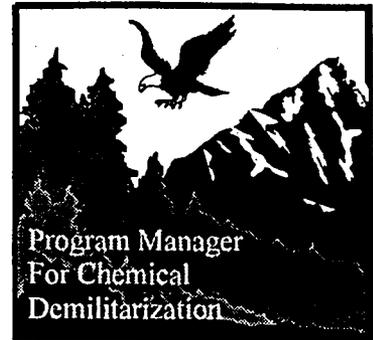
Mr. Pablo H. Padilla
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Environmental Protection Infrastructure
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P.O. Box 339
Zuni, New Mexico 87327-0339

File: Red, FWDA, 99
Track: FWDA, 02/22/99, TEAD/Fisher, HRMB/PJS, RE
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E N C L O S U R E



DRAFT



U.S. ARMY
PROGRAM MANAGER FOR
CHEMICAL DEMILITARIZATION

**SURVEY AND ANALYSIS REPORT
SECOND EDITION**

PROJECT MANAGER
FOR
NON-STOCKPILE CHEMICAL MATERIEL

DECEMBER 1996

**Table 10-1. Disposal Methodology Used as a Basis for the
Estimated Cost of Each Generic Site Type**

Generic Buried CWM Site Type	Disposal System
Chemical agent identification set	RRS
Small quantity, non-explosive	MMD-1
Small quantity, explosive	MMD-2
Range	MMD-2
Large quantity	Cryofracture/Incineration Demonstration Plant (fixed facility) or Capping

**Table 10-2. Estimated Percentage of Sites Requiring
Remediation Activities**

Potential Buried CWM Site Classification	PA/SI	RI/FS	RD/RA
1 - Known Burial	100%	100%	100%
2 - Likely Burial	100%	85%	70%
3 - Suspected Burial	100%	70%	50%
4 - Possible Burial	100%	50%	25%
5 - No Further Action	None	None	None

Table 1. List of Potential Buried CWM Locations and Sites
That May Require Remediation (Continued)

State	Component	Location	Site
Massachusetts ^a	FUDS	Fort Devens ^b	South Post ^c
Michigan ^a	FUDS	Chemical Warfare Development Division ^b	Dow Chemical Company Centralized Disposal Pits ^c
Mississippi	Air Force	Columbus Army Airfield	Unknown
	FUDS	Camp Van Dorn ^b	Detonation Pits ^c
Missouri ^a	FUDS	Camp Crowder ^b	Unknown ^c
Nevada	Army	Hawthorne Army Depot	HWAD-5
			HWAD-A11
			HWAD-A6e
New Jersey	FUDS	Fort Hancock	Beach
	Navy	Naval Air Warfare Center, Aircraft Division, Lakehurst	Proving Ground Airstrip
New Mexico	Army	Fort Wingate Depot Activity	Storage
New York	FUDS	Camp Hero ^b	Unknown ^c
North Carolina	FUDS	Laurinburg-Maxton Army Air Base	Landfill
	Navy	Marine Corps Base, Camp Lejeune	Rifle Range Chemical Dump
Ohio	Army	Ravenna Army Ammunition Plant	Site 28
	FUDS	Cleveland Plant ^b	Mustard Burial Site ^c
Oregon	Army	Umatilla Depot Activity	Northwest Corner

Table 3. Number of Potential Buried CWM Sites by State and Classification

State	Class 1	Class 2	Class 3	Class 4	Class 5	Total
AL	1	6	14	5	6	32
AK	1	2	2	2	3	10
AZ	1	2	1	None	None	4
AR	None	None	1	2	9	12
CA	2	None	None	1	1	4
CO	2	4	1	1	1	9
DC	None	None	None	None	2	2
FL	None	4	None	None	6	10
GA	None	2	None	None	1	3
HI	None	1	None	2	1	4
ID	None	None	None	None	1	1
IL	None	1	4	None	None	5
IN	None	None	2	1	None	3
IA	None	None	1	None	None	1
KS	None	None	None	None	1	1
KY	None	None	2	1	None	3
LA	None	1	2	None	3	6
MA	1	None	None	None	None	1
MD	8	3	2	None	None	13
MI	None	1	None	None	None	1
MS	None	1	None	1	5	7
MO	None	None	None	1	None	1
NE	None	None	None	None	1	1
NV	None	1	2	None	None	3
NJ	None	3	None	None	2	5
NM	None	None	None	1	None	1
NY	None	None	None	1	1	2
NC	None	1	1	None	None	2
OH	None	1	1	None	None	2

NEW MEXICO

NAME OF LOCATION: Fort Wingate Depot Activity

Fort Wingate was established in 1850 as a military outpost. In 1862, the fort received the name Fort Wingate and was later garrisoned by units of the New Mexico volunteers, the 37th U.S. Infantry, and the 3rd Cavalry.

At the beginning of World War I, the installation was designated as the Fort Wingate General Ordnance Depot, with the mission to store TNT. The depot was the largest storage depot of high explosives in the world.

The present Fort Wingate dates back to 25 February 1941, when construction was started on a new depot several kilometers west of the original Fort Wingate. In 1941, as the United States entered World War II, the installation became highly active with incoming and outbound shipments of high explosives. Storage of ammunition other than TNT began in 1942.

In 1962, plans were initiated to use Fort Wingate as a site for test firing the PERSHING and SERGEANT Missile systems. Several successful firings were conducted. Fort Wingate officially closed in January 1993.

Records of chemical-filled munitions storage at Fort Wingate were not found during the installation assessment that was conducted in 1980 or by the U.S. Army Environmental Hygiene Agency's Ground Water Contamination Survey conducted in 1988. However, status reports of chemical-filled ordnance dated 1 May 1942, stated that 28,932 75mm shells, (mustard-filled) and 46,669 155mm shells (mustard-filled) were in storage at Fort Wingate. The U.S. Army Technical Escort Unit records also state that 45 carloads of mustard-filled munitions were shipped from Fort Wingate, New Mexico, to the Black Hills Ordnance Depot, South Dakota, on 6 March 1944.

LOCALITY/STATE: Fort Wingate Depot Activity is located 8 miles east of Gallup, New Mexico and about 130 miles west of Albuquerque on Interstate 40. It is bordered on the west by the Bureau of Indian Affairs (Navajo Tribal Trust Land), Navajo Tribe (Freelands), on the south, on the east by the Cibola National Forest, and on the north by the Red Rock State Park. The depot occupies approximately 22,120 acres (34 square miles) of land in McKinley County, New Mexico.

SCOPE OF RESTORATION EFFORT: Reports mention that chemical agent was stored at Fort Wingate Depot Activity at one time but has since been removed. The installation assessment conducted by the U.S. Army Toxic and Hazardous Materials Agency in 1980 stated that no chemical or biological agents or radiological materials are stored on the installation. Personnel interviews conducted in 1992 during the preparation of the base closure environmental investigation work plans confirmed this fact, and as a result, the base closure remedial investigation/feasibility study (RI/FS) has not included investigations for chemical agents or related materiel.

EFFORT TO DATE: Restoration efforts associated with chemical agent are not currently applicable for the Fort Wingate Depot Activity.

REMEDIATION SCHEDULE: RI/FS was completed in July 1995. If new information develops, it will be followed up immediately.

RISK PERCEPTION: None due to chemical agent.

LOCATION Fort Wingate Depot Activity

LOCALITY Gallup

STATE NM

SITE Storage

DESCRIPTION Also known as Fort Wingate; used as a storage site. Source cites storage of 75-millimeter, 105-millimeter, and 155-millimeter mustard shells, and 30-pound mustard bomb.

SIZE Unknown

CONTENTS Unknown. Potential for 75-millimeter and 155-millimeter mustard shells due to storage site use.

COMMENTS In March 1944, source sites all munitions moved to the Black Hills Ordnance Depot (45 railcar loads). Complete inventory not specified.

TYPE Disposal

INSTALLATION Army

BURIED CWM SITE Small quantity, explosive

CLASSIFICATION 4 - Possible burial