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PETER MAGGIORE
SECRETARY

March 9, 1999

Mr. Larry D. Fisher
Directorate of Industrial Risk Management
Tooele Army Depot
SDSTE-IRE
Tooele, Utah 84074-5000

RE: Fort Wingate Depot Activity Technical Memorandum for Risk Assessment Methodologies

Dear Mr. Fisher:

The RCRA Permits Management Program (RPMP) has completed the Administrative Completeness Review of the Fort Wingate Depot Activity Technical Memorandum for Risk Assessment Methodologies submitted to NMED/HRMB on March 9, 1999. The document has been determined to be Administratively Incomplete and will not be considered for continued review until a revision is submitted. Under the hazardous waste fee regulation promulgated as 20 NMAC 4.2, this type of document would be considered as an RFI Work Plan and assessed a fee of \$6,500 for review. The submitted technical memorandum would require substantial additional information to qualify as a complete work plan. Attachment A outlines the major areas of information that would need to be added to produce an administratively complete work plan.

If you have any questions please contact me at (505)827-1561 ext. 1039 or Dr. Kirby Olson of my staff at the above address or by telephone at (505) 827-1561 ext. 1034.

Sincerely,

A handwritten signature in cursive script, reading "Robert S. Dinwiddie".

Robert S. (Stu) Dinwiddie, Ph.D., Program Manager
RCRA Permits Management Program

File: HSWA, FW, 99

Track: FW, 2/4/99, FW/Fisher, HRMB/KSO

Attachment A
Additional Information Needed for Work Plan

General

1. The work plan should include the ecological toxicity table and the response to NMED's comments on that table.
2. During the meetings in the fall and winter of 1998, there was discussion of additional background samples being taken for inorganic constituents of concern (notably arsenic). The work plan should discuss whether that additional sampling is still planned and what role it will play in the risk assessment.

Section 1.2

3. The secondary factors incorporated into the risk assessment process require further development. For example, "low frequency of detection" is cited as secondary factor. The work plan should include a maximum level at which this factor could be used to omit a constituent from further consideration, and what criteria for number and distribution of samples are applied to the data set before allowing the frequency exemption.
4. The work plan should delineate which regulatory criteria (such as TSCA) are being used in the screening process and how each one will be applied.

Section 1.4

5. Since the RI/FS has not yet been reviewed and approved, those components of the RI/FS which are part of the risk assessment protocol should be reproduced in the work plan with the changes to the exposure scenarios and model assumptions incorporated.

Section 1.5

6. The work plan should include the specifics for models used in the assessment, for example the standard EPA subsistence farming scenario. The work plan should include a discussion of the values for each parameter in the model and how the values are appropriate and protective for the site being evaluated. Values for exposure parameters may be changed to reflect site specific conditions if the rationale for the new value can be documented.
7. The work plan should include the model used for inorganic constituent uptake and the values used for the exposure parameters in that model.

Section 2.2

8. The preassessment criteria for evaluating sites to see if they will require an ecological risk assessment may be appropriate, but it is extremely important that they be applied using valid ecological principles. For example, habitat quality should include an examination of dominant vegetation and wildlife of the area in comparison to commonly used ecological or habitat indices. Consideration of future land use should be done with caution; industrial use of land is not necessarily incompatible with wildlife use of that land (example: peregrine falcons in downtown Atlanta).
9. The preassessment criteria are (by necessity) mostly qualitative and cannot be arranged into a decision tree. Therefore, it is difficult to evaluate their appropriateness without a few examples of their application. The work plan should include at least some examples of how they will be applied to actual sites at Ft. Wingate. Preferably, the results of this screening step for all Ft. Wingate sites expected to be excluded through this process should be included in the work plan. This will allow the administrative authority and the facility to come to consensus on which sites may be excluded through this process.
10. The preassessment criteria do not appear to include consideration of threatened and endangered species at any of the sites. A criteria should be added indicating that sites with these species will go through ecological risk assessment.