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**STATEMENT OF BASIS FOR
SWMUs/AOCs AND
RESPONSE TO COMMENTS
SUMMARY**

NMED - Hazardous Waste Bureau
Santa Fe

Hazardous Waste Facility Draft Permit - September 2004

Fort Wingate Depot Activity (FWDA)

McKinley County, New Mexico

EPA ID #: NM6213820974

Facility/Unit Type:
Contaminants:
Media:

FACILITY DESCRIPTION

FWDA is a former ammunition depot under the command of the United States Department of the Army (Army) and is classified as a hazardous waste treatment facility under the New Mexico Hazardous Waste Act (HWA), Sections 74-4-1 through 74-4-14, NMSA 1978, as amended, and the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6901 through 6992. The New Mexico Environment Department (NMED) proposes to issue a Hazardous Waste Permit to the Army that requires Army to, among other things, conduct corrective action activities for solid waste management units (SWMUs) and Areas of Concern (AOCs).

**STATEMENT OF BASIS FOR SWMUs AND AOCs AND RESPONSE TO
COMMENTS**

Following is the statement of basis for the SWMUs and AOCs listed in the September 2004 draft permit.

| SITE | PARCEL # | DESCRIPTION |
|---------|-------------|--------------------------------------------------------------------|
| SWMU 1 | 21 | TNT Leaching Beds & former Building 503 (no comments) |
| SWMU 2 | 21 | Building 515 - Painting/Acid Washout/Holding Pond (no comments) |
| SWMU 7 | 21 | Fire Training Ground (no comments) |
| SWMU 21 | 21 | Building 501 - Boiler House/Heating Plant 7 (no comments) |

SWMU 101 21 Building 500 - Ammunition Receiving

NMED Statement of Basis for site -

Building 500 and the surrounding area are considered to be an AOC because: [Shouldn't this be labeled "AOC" instead of "SWMU" then? LB]

- there is a reasonable suspicion of a release of hazardous waste or hazardous constituents to the environment as defined in the Draft Permit and NMED has determined that these releases may pose a current or potential threat to human health or the environment.

References:

- 20.4.1.500 NMAC (incorporating 40 CFR 270.32(b)(2))

- NMED has determined that there is a reasonable suspicion of a release at this site because similar sites at FWDA have clear evidence of releases. The reasonable suspicion of a release is based on soil and ground water contamination found at similar sites associated with storage, renovation, and disassembly of munitions (AOC 20: Igloo Block A; AOC 30: Igloo Block B; AOC 31: Igloo Block C; AOC 32: Igloo Block D; AOC 37: Igloo H, AOC 38: Igloo Block J; AOC 43: Igloo Block K; SWMU 29: Building 528; SWMU 13F: Building 542; and SWMU 125: Building 550). The above listed similar sites are associated with releases to the environment although they reportedly also managed munitions in covered containers.

References:

- An Army document indicates that munitions were received, unpacked, broken down in Building 500.

References:

- January 1980 Report No. 136.

- Industrial activities that took place in Building 500 included brush stenciling (i.e., painting), removing rusty bomb fins, refuzing shells and possible contaminants included solvents, carbon tetrachloride, TNT.

References:

- January 1980 Report No. 136

- NMED has determined that Building 500 has the potential to have released lead and PCBs to the environment from painted surfaces because lead and PCBs have been found in paint at other FWDA buildings, other FWDA buildings have contained peeling and flaking paint which was falling onto surrounding exterior soils, and all FWDA buildings constructed prior to 1978 (i.e., all buildings on FWDA including igloos) are presumed to contain lead-based paint.

References:

- 1994 CERFA Report; 1996
 - Lead-Based Paint Inspection Report; 1999
 - Building 11 PCB Investigation Report
 - 2000 Phase I Environmental Site Assessment for Parcels 6 and 22
- NMED notes that the Army collected soil samples next to some buildings in order to investigate releases from lead-based paint but has failed to provide these results to NMED. Also, see Response to Comment 68 regarding potential lead-based paint.

References:

- All buildings constructed prior to 1985 are presumed to contain asbestos containing material

References:

- 1994 CERFA Report
- At a minimum, Building 500 has the potential to have released munition constituents, including perchlorate, to the environment from munition-related activities; lead to the environment from lead-based paint, and PCBs to the environment from paint containing PCBs.

References:

- (1) January 1980, Report No. 136 Installation Assessment, p. 24 (we don't have complete copy).
- (2) April 11, 1994, Final Community Environmental Response Facilitation Act (CERFA) Report, FWDA, p. 4-1 and 4-2.
- (3) July 1, 1996, Lead-Based Paint Inspection Report.
- (4) March 23, 1999, Building 11 PCB Investigation Report, Table 3-1 (p. 4 of 4) and p. 3-6 and 3-7.
- (5) March 2000, Phase I Environmental Site Assessment Final Report, Fort Wingate, Parcels 6 and 22, p. 4-2).
- (6) January 15, 2001, letter from FWDA to NMED transmitting copies of portions of circa 1954 historical FWDA engineering drawings showing cesspool and septic tank locations.

Responses to Comments:

FWDA asserts that SWMU 101 (Building 500) is a duplicate site with SWMU 110 (Building 522) and that Building 500 was renumbered as Building 522 sometime prior to 1961. FWDA did not provide documentation to support this claim. NMED will retain SWMU 101 (Building 500) as a SWMU [or AOC?], until FWDA provides documentation that demonstrates to NMED's satisfaction that Building 500 is a duplicate of Building 522. NMED requests that FWDA provide a complete copy of the circa 1954

engineering drawings. NMED notes that FWDA previously provided excerpted portions of the circa 1954 drawings (see January 15, 2001, FWDA letter).

AOC 102 21 Building 507 - Smokeless Powder Magazine

NMED Statement of Basis for site -

Building 507 and the surrounding area are considered to be an AOC because:

- there is a reasonable suspicion of a release of hazardous waste or hazardous constituents to the environment as defined in the Draft Permit and NMED has determined that these releases may pose a current or potential threat to human health or the environment.

References:

- 20.4.1.500 NMAC (incorporating 40 CFR 270.32(b)(2))

- NMED has determined that there is a reasonable suspicion of a release at this site because similar sites at FWDA have clear evidence of releases. The reasonable suspicion of a release is based on soil and ground water contamination found at similar sites associated with storage, renovation, and disassembly of munitions (AOC 20: Igloo Block A; AOC 30: Igloo Block B; AOC 31: Igloo Block C; AOC 32: Igloo Block D; AOC 37: Igloo H, AOC 38: Igloo Block J; AOC 43: Igloo Block K; SWMU 29: Building 528; SWMU 13F: Building 542; and SWMU 125: Building 550). The above listed similar sites are associated with releases to the environment although they reportedly also managed munitions in covered containers.

References:

- NMED has determined that Building 507 has the potential to have released lead and PCBs to the environment from painted surfaces because lead and PCBs have been found in paint at other FWDA buildings, other FWDA buildings have contained peeling and flaking paint which was falling onto surrounding exterior soils, and all FWDA buildings constructed prior to 1978 (i.e., all buildings on FWDA including igloos) are presumed to contain lead-based paint.

References:

- 1994 CERFA Report; 1996
- Lead-Based Paint Inspection Report; 1999
- Building 11 PCB Investigation Report
- 2000 Phase I Environmental Site Assessment for Parcels 6 and 22

- NMED notes that the Army collected soil samples next to some buildings in order to investigate releases from lead-based paint but has failed to provide these results to NMED. **[Does the soil report they just sent cover this site?]**

- All buildings constructed prior to 1985 are presumed to contain asbestos containing material.

References:

- 1994 CERFA Report
- At a minimum, Building 507 has the potential to have released munition constituents, including perchlorate, to the environment from munition-related activities; lead to the environment from lead-based paint, and PCBs to the environment from paint containing PCBs. Also, see Response to Comment 68 regarding potential lead-based paint.

References:

- (1) May 1961, Facilities Data, p. 100.
- (2) September 1986, General Site Map, Workshop Area, Drawing No. 18-02-04, Sheet 24 of 32.
- (3) March 1990, Enhanced Preliminary Assessment, p. 17.
- (4) April 11, 1994, Final Community Environmental Response Facilitation Act (CERFA) Report, FWDA, p. 4-1 and 4-2.
- (5) July 1, 1996, Lead-Based Paint Inspection Report.
- (6) March 23, 1999, Building 11 PCB Investigation Report, Table 3-1 (p. 4 of 4) and p. 3-6 and 3-7.
- (7) March 2000, Phase I Environmental Site Assessment Final Report, Fort Wingate, Parcels 6 and 22, p. 4-2).

Responses to Comments:

NMED does not agree to remove this AOC from Attachment 8. FWDA has not demonstrated that this building and the surrounding area do not pose a current or potential threat to human health or the environment.