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RON CURRY
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SARAH COTTRELL
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 21, 2010

Mark Patterson
Ravenna Army Ammunition Plant
Building 1037
8451 State Route 5
Ravenna, OH 44266

Steve Smith
CESWF-PER-DD
819 Taylor Street, Room 3A12
PO Box 17300
Fort Worth, TX 76102-0300

**RE: SECOND NOTICE OF DISAPPROVAL
RCRA FACILITY INVESTIGATION
WORK PLAN FOR PARCEL 6
FORT WINGATE DEPOT ACTIVITY
EPA ID# NM6213820974
FWDA-08-001**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) received the Department of the Army's (the Permittee) *Resource Conservation and Recovery Act (RCRA) Facility Investigation Work Plan for Parcel 6 (Revised)*, dated April 30, 2010 (Work Plan) and submitted pursuant to Section VII.H of the Fort Wingate Hazardous Waste Facility Permit. NMED has reviewed the Work Plan and hereby issues this second Notice of Disapproval (NOD). The Permittee must address the following comments in a revised Work Plan.

COMMENT 1

Where the Permittee proposes to collect soil samples for volatile organic carbon (VOC) analyses, it must ensure that relatively undisturbed discrete soil samples are collected and that the soil is not homogenized prior to analysis.

COMMENT 2

In Section 8.2.2 (Sampling Data), page 8-11, the Permittee states “[f]ollowing the excavation activities, confirmation soil samples were collected from the bottom of the excavations and the site was backfilled with clean soil, regraded, and revegetated.” The Permittee did not include the sampling depths for the confirmation soil samples. The sampling depths for the confirmation samples are also not included in the referenced document (*Final Report Removal and Disposal of Western Landfill; USACE, 2005*). The Permittee must revise the Work Plan to specify the depths beneath the ground surface or from the base of the excavation at which confirmation samples were collected. If the sampling depths are unknown, the Permittee must state this in the revised Work Plan.

COMMENT 3

In Section 8.3.2 (Media Characterization), page 8-14, the Permittee states “[i]n January, 2009, a low altitude airborne vertical magnetic gradient geophysical survey was conducted over the Fort Wingate Army Depot, New Mexico.” The Permittee also states that “[t]he results of the airborne geophysical survey for SWMU 20 are shown in Figure 8-5.” Based on the results shown in Figure 8-5, it appears that many geophysical anomalies were not investigated or removed throughout SWMU 20. With the exception of the railroad classification yard and SWMU 25, the Permittee must therefore identify and remove all waste associated with geophysical anomalies at the locations identified by NMED in the attached Figure 8-5. The Permittee must also determine whether hazardous constituents have been released to the environment. The waste must also be profiled for proper disposal. The Permittee must revise the Work Plan to include the proposed characterization and removal actions.

COMMENT 4

In Section 12.4 (Scope of Activities), page 12-4, the Permittee proposes to collect one discrete soil sample from 1 to 6 inches below ground surface (bgs) at each transformer location. The Permittee does not discuss sample collection for the pad-mounted transformer. As specified in Comment 31 of NMED’s February 4, 2010 Notice of Disapproval, the Permittee must ensure that one soil sample is collected from each side of the concrete pad transformer, from 1 to 6 inches bgs. The soil samples may be composited for analyses. The Permittee must revise the Work Plan accordingly.

COMMENT 5

In Appendix N (Comment Response Table) Comment Number 29, the Permittee states “[t]he Army BRAC Headquarters will be providing a letter to the NMED on the sampling of igloo interiors in Parcel 22. The sampling of igloo interiors in Parcel 4 and 6 will be similar to those proposed for Parcel 22.” NMED received the letter from BRAC Headquarters, dated June 11, 2010. In the letter the Permittee requested a description for swipe sampling protocol and regulatory criteria to be used. NMED provided a response, dated October 1, 2010 which included the requested protocol for sampling igloo interiors. The Permittee must refer to

NMED's letter and revise the Work Plan to include proposed sampling methods for igloo interior sampling.

COMMENT 6

In Section 13.3.8 (Scope of Activities), page 13-13, the Permittee requests "NFA" at AOC 78/82. Based on the geophysical survey results, the soil sampling results and the metallic anomaly intrusive investigation, NMED concurs that no further characterization is necessary at AOC 78/82.

COMMENT 7

In Section 17.2.1 (Nonsampling Data) (Final Report on Airborne Geophysical Survey, Batelle, 2009), page 17-4, the Permittee states "[t]he results of the airborne geophysical survey for AOC 83 are shown in Figure 17-2. The magnetic anomalies visible in AOC 83 are related to gravel imported to the site for the temporary building pad and road base." Based on Figure 17-2 it appears that there are geophysical anomalies and ground disturbance. The Permittee must propose to excavate three exploratory test pits to determine if waste was buried at the site. The Permittee must revise the Work Plan to include the proposed investigations at this AOC.

COMMENT 8

In Section 18.4.1 (Multi-Incremental Soil Sampling), page 18-12, the Permittee proposes to collect multi-incremental soil samples from AOC 84. NMED concurs with this sampling approach for this phase of investigation; however, based on the results the Permittee may be required to conduct further investigations AOC 84. No revisions to the Work Plan are necessary.

The Permittee must address all comments contained in this letter and submit a revised Work Plan. The Permittee must include a cover page with the revised document that indicates that the submittal is a revision and was prepared for NMED. The revised document must be accompanied with a response letter that details where all revisions have been made, cross-referencing NMED's numbered comments. The Permittee must also submit an electronic copy of the revised document with all edits and modifications shown in redline-strikeout format. The revised Work Plan must be submitted to NMED no later than January 31, 2011.

Messrs. Patterson and Smith
October 21, 2010
Page 4

If you have any questions regarding this letter, please contact Tammy Diaz-Martinez at (505)-476-6056.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

cc: Tammy Diaz-Martinez, NMED HWB
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File: FWDA 2010 & Reading File
FWDA-08-001

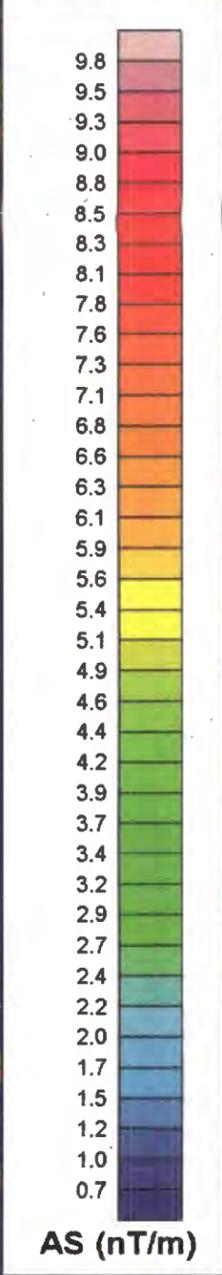
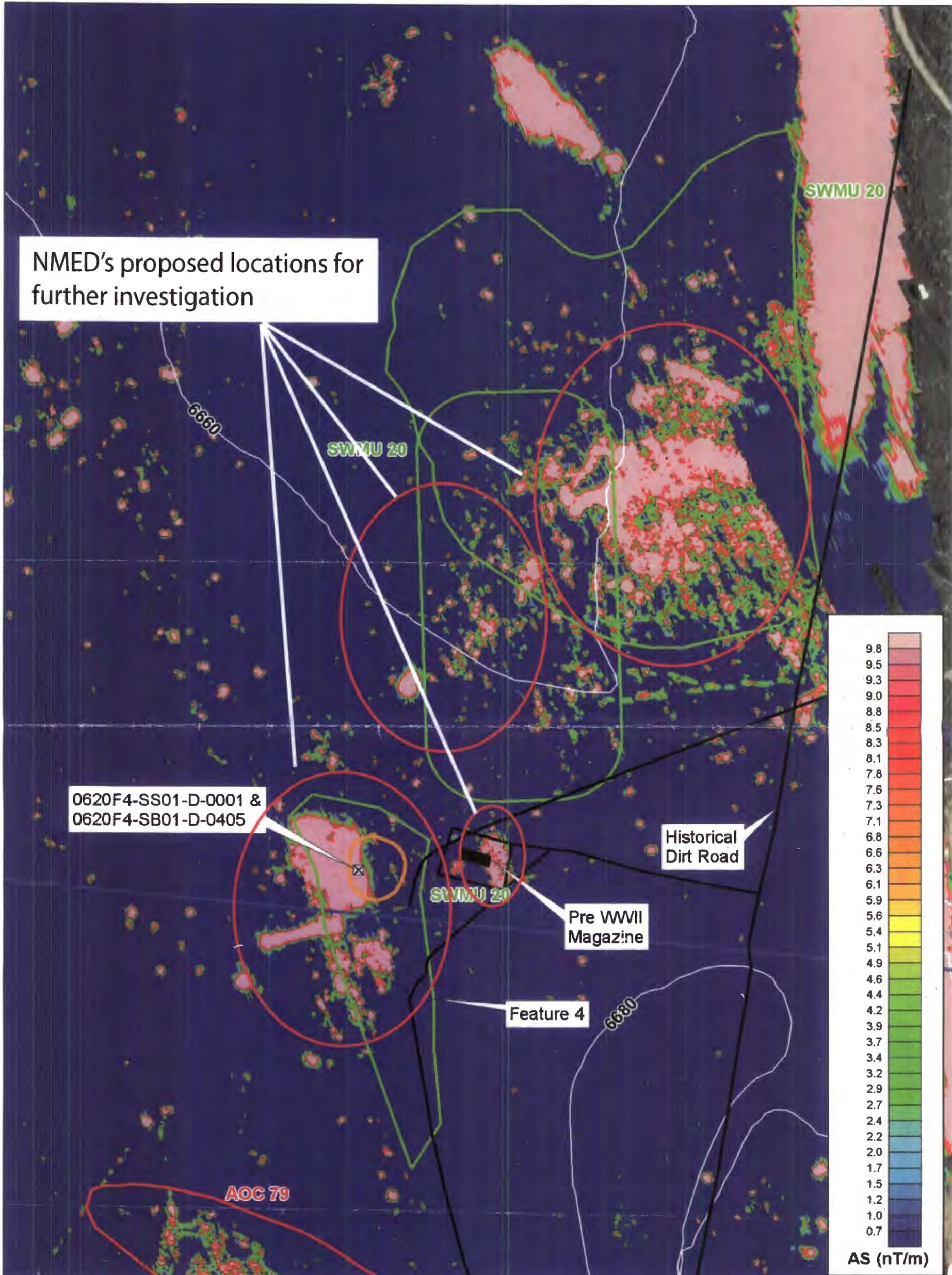


Figure 8-5
Airborne Geophysical Survey of SWMU 20
Fort Wingate Depot Activity, New Mexico

Legend

- ☒ Proposed Sampling Location
- ▭ Disturbed Area
- ▭ SWMU Boundary
- ▭ AOC Boundary
- ▭ Parcel 6 Boundary

North Arrow

Scale: Equals 250 feet

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