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ENTERED

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 17, 2015

Mark Patterson
FWDA, BRAC Coordinator
P.O. Box 93
Ravenna, OH 44266

Steve Smith
USACE FWDA Program Manager
CESWF-PEC-EF
819 Taylor Street, Room 3A12
Fort Worth, TX 76102

RE: DISAPPROVAL
FINAL RCRA FACILITY INVESTIGATION REPORT
PARCEL 22, REVISION 1.0
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-11-011

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) has reviewed the *Final RCRA Facility Investigation Report, Parcel 22; Revision 1.0* (Report) dated October 15, 2014 for Fort Wingate Depot Activity. The Report summarized the operations and investigations conducted at three solid waste management units (SWMUs) 12, 27, and 70 as well as four area of concern (AOCs) 30, 69, 75, and 88. NMED has reviewed the Report and hereby issues this Disapproval and provides the following comments.

Background

Comment 1. In Section 2.3, Topography, line 31, page 2-5, the Permittee states "[...] storm drainage culverts in and around Parcel 22 are shown in Figure 2-3." Provide the correct reference to Figure 2-5.

SWMU 12 –Building 536, Inspectors Workshop and Ammunition Renovation Depot

Comment 2. In Section 3.2.1, Historical Aerial Photograph Analysis, page 3-2, lines 18-21, the Permittee states, "[a]dditionally, the analysis noted open storage of probable crates east of Building 536 in the 1997 aerial. These features were not present during the site reconnaissance and are suspected to have been materials stored by TPL during their operations with Building 536." Discuss whether or not there is was any potential for a release of contamination to the environment from TPLs storage activities.

SWMU 27 – Building 528 Complex

Comment 3. In Section 4.4.3.2 Bedrock Monitoring Wells, page 4-16 lines 25-29, the Permittee references the static water levels but accidentally wrote "screen length" in the bulleted text. Revise accordingly.

Comment 4. In Section 4.6.3, Groundwater Characterization, page 4-20, lines 30-32, the Permittee states "[t]he Army will continue to monitor groundwater contamination in Parcel 22 and add additional wells in the summer of 2011 and in 2012 to characterize the extent of contamination." Discuss if these wells were added in 2011 or 2012 or are additional wells proposed for 2014 and 2015. Provide current information on these wells.

SWMU 70 – Disassembly Plant and TPL QA Test Area

Comment 5. Photo 5-42 and 5-43, SWMU 70, "USGS drilling holes for MI (Multi-incremental) sampling," page 5-86 and 5-87. The photos depict an auger being used for field work. Provide an explanation regarding the use of auger drilling for MI sampling. Method 8330B states that samples should be collected at the surface normally ranging between 0" to 6" or 0" to 12". In addition, these photographs seem to contradict the sampling description provided in Section 5.4.2, Soil Investigation, page 5-6, lines 29-38. Demonstrate that the MI samples were collected in accordance with EPA Method 8330B. If the Permittee cannot demonstrate that the data collected is defensible, then additional sampling must be conducted.

Comment 6. In Section 5.4.2, Soil Investigation, page 5-6, lines 11-13, the Permittee states "[t]hese soil borings were to be completed to a depth of 10 ft bgs, USGS personnel, however, encountered refusal at a depth of 5 ft bgs. Therefore, samples from 8 to 10 ft bgs were not collected." Sampling at these two locations is incomplete. Provide an explanation as to why the borings were not moved to an alternate location to attempt to reach the total depth required in the work plan. In addition, in Section 5.6, Conclusion and Recommendations, provide a statement regarding the impact on the investigation related to the limited sampling depths.

AOC 30 – Igloo Block D

Comment 7. In Section 6.2.4, Soil Characterization, page 6-5 to 6-6, the Permittee refers to a wipe sampling event that occurred in the interior of the igloos. The wipe sample analysis was reviewed by the Agency for Toxic Substance and Disease Registry (ATSDR), Health Consultation for FWDA. The review recommended additional sampling in the igloo interiors after concluding that the existing data appeared inadequate to characterize the extent of contamination. ATSDR submitted a letter in March 2009 detailing their concerns regarding the inadequacy of the wipe sampling data, along with a suggested sampling approach to resolve the issue. A discussion regarding the adequacy of this sampling event must be included in this section since the report was technically inadequate according to ATSDR. This issue may be addressed with a proposal for an alternative approach (e.g., encapsulation of the igloo interiors) that could be applied facility wide.

Comment 8. In Section 6.6, Conclusions and Recommendations, page 6-10, the Permittee does not provide an explanation for the composite sample 2230D-1186SS-C-SO exceeding the SSLs for 2,4-dinitrotoluene at the drain outfall of igloo 1186. Provide a statement regarding future plans for resolving this exceedance (e.g., soil removal).

Comment 9. In Section 6.6, Conclusions and Recommendations, page 6-10, lines 28-31 the Permittee states, "[t]he Army will use both the 2009 exceedances shown on Figure 6-3 and the 2010 XRF exceedances shown of Figure 6-4 as the data of record determining exceedances of the cleanup levels. The 10 XRF confirmation samples will not be used." XRF confirmation sample 1158SS exceeded the SSL for lead. This sample is the only sample that will not be addressed in the data of record listed on Figures 6-3 and 6-4. Either confirmation sampling must be conducted or this igloo must be included in the work plan for the removal of the drainpipe and the soil.

AOC 75 – Electrical Transformer Locations

Comment 10. In Section 8.4, Current Investigation (2009-2010), page 8-6, the paragraphs in lines 22-27 and lines 40-42; 1-3 are the same. Revise accordingly.

AOC 88 – Former Buildings of Structures and Disposal Areas Southwest, South, and Southeast of Building 528

Comment 11. Photos 9-7 and 9-8, AOC 88B, 88A, USGS soil borings for MI (Multi-incremental) sampling, page 9-42. Provide an explanation regarding the use of auger drilling for MI sampling. Method 8330B states that sampling should be collected at the surface normally ranging between 0" to 6" or 0" to 12". In addition, these photographs seem to contradict the sampling description stated in Section 9.4.2, Soil Investigation, page 9-4, lines 8-16. Provide clarification. Demonstrate that the MI samples were collected in accordance with EPA Method

8330B. If the Permittee cannot demonstrate that the data collected is defensible, then additional sampling must be conducted.

Comment 12. In Section 8.2.3.1, Building 536 Transformers, the Permittee refers to literature regarding the transformers located in Appendix D. Appendix D is a sample collection log. Provide the correct reference.

The Permittee must submit a revised Report with responses to NMED's comments, cross-referencing NMED's numbered comments. The revised Report must be submitted on or before **May 31, 2015**.

If you have any questions regarding this letter, please contact Vicky Baca at (505) 476-6059.

Sincerely,

John E. Kieling
Chief
Hazardous Waste Bureau

cc: Dave Cobrain, NMED, HWB
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File: FWDA 2015 and Reading
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