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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 29, 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: APPROVAL WITH MODIFICATIONS
PERMITTEE-INITIATED INTERIM MEASURES WORK PLAN
PARCEL 6
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-15-003**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) has reviewed the revised *Permittee-Initiated Interim Measures Work Plan, Parcel 6; Revision 1.0* (Plan) dated May 4, 2015 for Fort Wingate Depot Activity (Permittee). NMED and hereby issues this approval with the following modifications.

The Permittee's response in the revised Plan to NMED's Disapproval letter dated March 6, 2015 to comments 6 and 8 is not acceptable. Discrete samples must be collected at the perimeters of each excavation. The Permittee must incorporate the following modifications during field execution of the Plan:

1. Permittee's Response to Comment 6, Former Building 537, Section 4.3. "Section 4.3 and Table 4.2 have been revised in the Work Plan to incorporate the collection of discrete samples from the bottom of the removal areas. Sample numbers have been reassigned to reflect

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discrete sampling and specific analysis was included for each sample. As discussed during the March 25, 2015 conference call with USACE and NMED, one nine-part composite sample will be collected every 50 feet along the entire perimeter or sidewall of each removal area. The sample numbers have been reassigned to reflect discrete sampling and specific analysis was included for each sample. Figure 4-3 has also been revised.”

NMED Response to Permittee’s Response for Comment 6:

Discrete samples must be collected at the sidewalls of the excavations. As stated in the NMED’s Disapproval, compositing soil samples may result in contaminant concentrations that are not representative of concentrations remaining in the soil. In addition, the proposed discrete sampling is insufficient for a determination of corrective action complete at the site. Therefore, the Permittee must conduct the following:

- a. Collect discrete samples at the base of the excavation using generally a 30-foot (ft) by 30-ft sampling grid to collect random discrete samples and analyze them for PCBs using EPA Method 8082A, and SVOCs using EPA Method 8270D.
- b. Collect discrete samples in Areas A, F, B and E every 10 ft along the excavation perimeters and analyze them for PCBs using EPA Method 8082A, and SVOCs using EPA Method 8270D.
- c. Collect discrete samples in Areas C and D every 15 ft along the side walls of the excavation and analyze them for PCBs using EPA Method 8082A, and SVOCs using EPA Method 8270D.

2. **Permittee’s Response to Comment 8, Feature 4, Section 5.3.** “As discussed during the March 25, 2015 conference call with USACE and NMED, discrete samples will be collected from the base of each removal area. The sample numbers have been reassigned to reflect discrete sampling and specific analysis was included for each sample. Figure 5-2 has also been revised. The location that prompted the comment to collect and analyze for Fluoride was misidentified and is not located in Feature 4.”

NMED Response to Permittee’s Response for Comment 8:

Discrete samples must be collected at the sidewalls of the perimeter of excavation. As stated in the NMED’s Disapproval, compositing soil samples may result in contaminant concentrations that are not representative of concentrations remaining in the soil. In addition, the proposed discrete sampling at the base of excavation is insufficient for a determination of corrective action complete at the site. Therefore, the Permittee must conduct the following:

- a. Collect discrete samples every 20 ft at the limits of the excavation and analyze them for RCRA 8 metals using EPA Method 6010C and Method 7471B; PCBs using EPA Method 8082; SVOCs using EPA Method 8270D; VOCs using EPA Method 8260C; and pesticides using EPA Method 8081B. However, the work proposed in Feature 4 is the removal of surface debris; therefore, discrete samples must be collected from the

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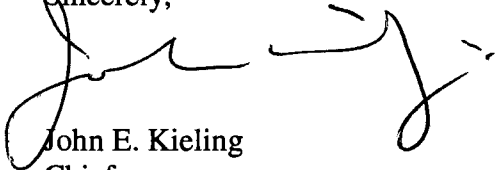
sidewalls of excavation only in the event debris is located at a depth greater than 1 foot-below ground surface (ft-bgs).

- b. Collect discrete samples at the base of the excavation using generally a 20-ft by 20-ft sampling grid to collect random discrete samples and analyze them for RCRA 8 metals using EPA Method 6010C and Method 7471B; PCBs using EPA Method 8082; SVOCs using EPA Method 8270D; VOCs using EPA Method 8260C; and pesticides using EPA Method 8081B.

The Permittee must address these modifications during the implementation of the Plan and include the results in the Investigation Report, which must be submitted to NMED no later than **February 27, 2016**.

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
FWDA-15-003