



DEPARTMENT OF THE ARMY
FORT WINGATE DEPOT ACTIVITY
P.O. BOX 268
FORT WINGATE, NM 87316

ENTERED

September 2, 2015

RECEIVED

Mr. John Kieling
Chief, Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

SEP 8 2015

NMED
Hazardous Waste Bureau

Dear Mr. Kieling:

The purpose of this letter is to submit a petition for the Corrective Action Complete Determination without controls for Area of Concern (AOC) 29 (igloo block C) and AOC 75 (transformer site in Parcel 2) at Fort Wingate Depot Activity (FWDA). In addition the Army proposes removing Parcel 4A from RCRA Permit EPA ID# NM6213820974 (Permit). The Army proposes modifying Permit Attachment 8 by moving AOCs 29 and 75 within Parcel 4A, 2, 19, and 23 from Table 1 (SWMUs and AOCs that Require Corrective Action) to Table 4 (SWMUs and AOCs Corrective Action Complete Without Controls) and modifying Attachment 2 depicting the parcel removed. The Army elected to address the entire AOC 29 under Parcel 4A to expedite the restoration and transfer process. Upon further examination, AOC 29 only lies in Parcels 4A and 2. It does not lie in Parcels 19 and 23. The rationale for this petition is provided in the paragraphs below.

AOC 29 is found in Parcels 4A and 2. AOC 29 is listed in Permit Attachment 8, Table 1, as "Igloo Block C." AOC 75 is listed in Attachment 8, Table 1 as "Electrical Transformers" and covers all transformers on FWDA regardless of Parcel number.

The Army submitted to NMED a *Final of the Release Assessment Report (RAR) for Parcel 4A (Revision 2)*, dated October 11, 2012. This report summarized the previous editions of the RAR which were disapproved by NMED. The Army does not have a record of the NMED reviewing this document. However, the Army elected to implement all the recommended soil removal actions in the RAR under a Permittee-Initiated Interim Measures in accordance with Permit Section VII.G.3. The interim measures were outlined in the Notification of Permittee-Initiated Interim Measures dated September 10, 2013 which was approved by the NMED on September 24, 2013 via email correspondence. Interim measures were conducted in October and November 2013 and included small amounts of soil removal under igloo drain pipes where the soil exceeded clean up levels and removal of the drain pipes on each igloo. The holes were plugged with concrete. Former transformer site I-25 (AOC 75) was sampled under this notification. This site lies in Parcel 2 however the Army elected to sample the site under the Parcel 4A action due to its proximity to the AOC 29 area. No PCBs were detected in the sample.

The Army submitted a *Final Permittee-Initiated Interim Measures Report for Parcel 4A* to the NMED on April 15, 2104. Based on the confirmation sampling results and results at the former transformer site the Army recommended no further investigation or corrective action for the soils within AOC 29 (Igloo Block C) and transformer site I-25 (AOC 75). The NMED

approved the report on August 1, 2014. The only other site within Parcel 4A was AOC 78 which has been removed from the Permit. Since AOC 29 and 75 are the only Permit sites remaining in Parcel 4A, the Army petitions Parcel 4A for removal from the Permit. Permit Attachment 2 has been updated to reflect this change and is attached to this letter.

All of the above cited documents were submitted to the Pueblo of Zuni and the Navajo Nation for Tribal consultation concurrently with the submission to NMED. This consultation is required by Permit Section VIII.B.1. Copies of all the correspondence and documents referenced in this letter can be found in the FWDA Administrative Record and online at www.ftwingate.org. If you have questions or require further information, please call me at 330-358-7312.

Sincerely,



Mark Patterson
BRAC Environmental Coordinator

CF:

Dave Cobrain, NMED HWB
Vicky Baca, NMED HWB
Neelam Dhawan, NMED HWB
Bill O'Donnell, BRACD
Chuck Hendrickson, U.S. EPA Region 6
William Walker, BIA SW
Eugenia Quintana, Navajo Nation
Sharlene Begay-Platero, Navajo Nation
Mark Harrington, Pueblo of Zuni
Clayton Seoutewa, BIA Zuni Agency
Rose Duwyenie, Navajo BIA-NR
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Larry Rodgers, Acting Deputy Chief of Staff
Judith Wilson, DOI/BLM
Eldine Stevens, DOI/BLM
Angela Kelsey, BIA
FWDA Admin Record, NM
FWDA Admin Record, OH