



ENTERED
AQS, Inc.
2112 Deer Run Drive
South Weber, Utah 84405

(801) 476-1365
www.aqsnet.com

September 9, 2015

DCN: NMED-2015-19

Mr. David Cobrain
NMED - Hazardous Waste Bureau
2905 Rodeo Park Dr. East
Building One
Santa Fe, NM 87505

RECEIVED

SEP 14 2015

NMED
Hazardous Waste Bureau

RE: Draft Technical Review Comments on the Final Work Plan Parcel 11 Solid Waste Management Units (SWMUs) 10 and 40, Fort Wingate Depot Activity, McKinley County, New Mexico

Dear Mr. Cobrain

Attached please find draft technical review comments on the Final Work Plan Parcel 11 Solid Waste Management Units (SWMUs) 10 and 40, Fort Wingate Depot Activity, McKinley County, New Mexico, dated April 2015. While the report does not contain any risk assessment related issues, Ms. Vicky Baca requested a review of the fundamental assumptions and statistical assessments contained within the report.

For SWMU 10, it appears that 100% of all anomalies are to be investigated and if additional anomalies are found, a second phase of investigation will be conducted to ensure all 20 millimeter (mm) munitions have been recovered.

For SWMU 40, there is a general concern with the report is that it is unclear the goal of the work. While the report states it is to conduct additional investigation in selected parcels and defines the data quality objective as to determine the presence or absence of munitions of explosive concern (MEC), the report does not define the end regulatory status. It is not certain if this work is to define another field investigation process or if a determination of no further action is sought. The underlying assumptions that are used in the statistical determination of the number of anomalies to be investigated assume that there is an absence of MEC, meaning if any MEC is found (i.e., there is presence), the site does not meet the criteria for closure with no control/free release. Additional clarification on the objectives of this report is warranted. A general comment has been drafted on this issue.

If you or any of your staff have questions, please contact me at (801) 451-2864 or via email at paigewalton@msn.com.

Thank you,

The contents of this deliverable should not be evaluated as a final work product.

Paige Walton

Paige Walton
AQS Senior Scientist and Program Manager

Enclosure

cc: Vicki Baca, NMED (electronic)
Neelam Dhawan, AQS (electronic)
Joel Workman, AQS (electronic)

03/20/11
1:58 PM

**Draft Technical Review Comments on the Final Work Plan Parcel 11 Solid Waste
Management Units (SWMUs) 10 and 40, Fort Wingate Depot Activity, McKinley County,
New Mexico
April 2015**

GENERAL COMMENTS

1. A general concern with the report is that it is unclear the goal of the work for Solid Waste Management Unit (SWMU) 40. While the report states it is to conduct additional investigation in selected parcels and defines the data quality objective as to determine the presence or absence of munitions of explosive concern (MEC), the report does not define the end regulatory status. It is not certain if this work is to define another field investigation process or if a determination of no further action is sought. The underlying assumptions that are used in the statistical determination of the number of anomalies to be investigated assume that there is an absence of MEC, meaning if any MEC is found (i.e., there is presence), the site does not meet the criteria for closure with no control/free release. Additional clarification on the objectives of this report is warranted.
2. While Appendix K provides some of the algorithms for the Estimating a Proportion Method, it appears that the program Visual Sample Plan (VSP) may have actually been used to determine the sample sizes for the digital geophysical mapping (GPM). Clarify if VSP was used (UXO estimator program) or if the equations shown in Appendix J were used in a spreadsheet. In order to cross check assumptions and calculations, either provide the input/output files for VSP or provide the spreadsheets used to determine the sample sizes.

SPECIFIC COMMENTS

1. Section 4.2.2. Clarify if any surface inspections have been performed at SWMU 40 and if so, if any surface debris (munition debris, munitions of explosive concern, etc.) were found.
2. Section 4.3. The maximum depth of anomaly investigation is set at four (4) feet (ft) below ground surface (bgs). Clarify the basis for the maximum depth of 4 ft bgs.

In addition, the report indicates that if items are found at a greater depth, the Corp will be contacted, but it is not clear whether additional investigations of deeper anomalies will be conducted. If the intent of this field effort is to obtain a closure with no controls, unrestricted release, discuss how risks are to be mitigated from items buried between 4 and 10 ft bgs and how uncertainty for buried items between six and 10 ft bgs (outside the range of the proposed instrumentation) will be addressed.

3. Section 4.3. The initial testing of the analog geophysical sensor is to verify the instrument is capable of detecting an item in horizontal orientation to at least of depth of six (6) inches bgs. However, the anomaly reacquisition performance criteria is only 1.5 meter accuracy. Please clarify.