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September 9, 2015

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SEP 14 2015

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

**NMED
Hazardous Waste Bureau**

RE: Draft Technical Review Comments on the Final Work Plan Parcel 22 Solid Waste Management Units (SWMUs) 12, 27, 70 and AOCs 88A & 88B, Fort Wingate Depot Activity, McKinley County, New Mexico

Dear Mr. Cobrain

Attached please find draft technical review comments on the Final Work Plan Parcel 22 SWMUs 12, 27, 70 and AOCs 88A & 88B, 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.

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,

Paige Walton
AQS Senior Scientist and Program Manager

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

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Enclosure

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

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OFFICE OF THE ATTORNEY GENERAL
STATE OF NEW MEXICO

**Draft Technical Review Comments on the Final Work Plan Parcel 22 SWMUs 12, 27, 70
and AOCs 88A & 88B, 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. 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 J 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.
- 3.

SPECIFIC COMMENTS

1. Section 4.3. The maximum depth of anomaly investigation is set at four (4) feet (ft) below ground surface (bgs). It appears that this depth was based on site history in Solid Waste Management Unit (SWMU) 70 where testing by detonation included burying items to a depth of 4 ft 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. However, when munitions are buried for treatment via detonation, there is kickout but also munitions and/or munitions debris can be forced downward. This is especially true if multiple detonations have occurred in the same location. For risk assessment purposes, depth of up to 10 ft bgs are typically considered as that is the reasonable intrusive depth defined for both residential and industrial/construction workers. Further, the proposed Dynamic NanoTEM system only allows for detection of items to six feet. 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.

2. Section 6.4. Of the 2,666 anomalies detected in SWMU 27, only 336 will be intrusively investigated. This number appears proportionately low compared to the other SWMUs. Please verify the calculations.