



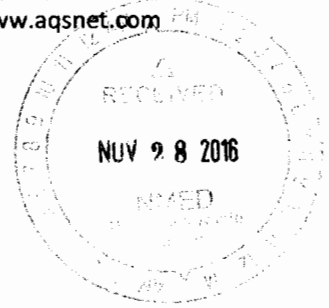
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November 23, 2016

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Mr. David Cobrain
New Mexico Environment Department (NMED)
Hazardous Waste Bureau
2905 Rodeo Park Dr. E/Bldg 1
Santa Fe, NM 87505



RE: Evaluation of Chapter 12 of the *Final RFI Phase 2 Work Plan Parcel 11*, Fort Wingate Depot Activity, McKinley County, New Mexico.

Dear Mr. Cobrain:

Attached please find draft technical comments on Chapter 12 of the *Final RFI Phase 2 Work Plan Parcel 11*, Fort Wingate Depot Activity (FWDA), McKinley County, New Mexico, dated 2016.

Chapter 12 does refer to use of the FWDA-wide dilution attenuation factor (DAF). AQS submitted comments (dated February 16, 2016) on the derivation and use of this DAF. AQS is not aware of any responses to these comments or modifications to the DAF. As such, we considered that our previous comments on the DAF are applicable to this work plan.

If you have any questions, please contact me at (801) 451-2864 or via email at pwalton@aqsnnet.com.

Thank you,

Paige Walton
AQS Senior Scientist and Program Manager

cc: Ben Wear, NMED (electronic)
Neelam Dhawan, NMED (electronic)
Joel Workman, AQS (electronic)

Draft Technical Comments on Chapter 12 of the *Final RFI Phase 2 Work Plan Parcel 11, Fort Wingate Depot Activity (FWDA), McKinley County, New Mexico*

1. Section 12, Global. In several sections, the work plan allows that solid waste management units (SWMUs) and/or areas of concern (AOCs) may be grouped together for evaluating risk. Please note that grouping will be evaluated and require acceptance on a site-specific basis once all data have been collected and an assessment of contamination can be conducted (which may include spatial evaluation, magnitude of contamination, constituents of potential concern, continuity of areas and use, and hot spots). Grouping of sites may or may not be deemed appropriate. Further, grouping of SWMUs/AOCs may not be done to mitigate hot spot analyses.
2. Section 12.1, Conceptual Site Exposure Model, page 12-2. Under bullet point 1, it is stated that while potentially complete, the industrial scenario will not be evaluated as the residential screening assessment will be protective of an industrial worker. Also, it is assumed that this applies for both bullet points 2 and 3. It is agreed that the residential scenario is protective of an industrial/commercial worker; however, for completeness, please ensure this statement is carried forward into the risk assessment reports once completed.
3. Section 12.1, Conceptual Site Exposure Model, page 12-2. Under bullet point 3, property that contains structures is discussed. The text allows that due to the highly-developed nature of these areas, the only complete receptor are the industrial and construction workers. Further grazing of cattle is also deemed incomplete due to the structures in place (see Comment 6). Clarify whether the end use of these properties is to remain under Army control or if the properties are to be transferred to another entity. By not evaluating the residential scenario, the land will require land use restrictions, limiting the future use of the property to industrial use only. If the Army wished to demonstrate clean closure with no restrictions, then it must be assumed that the future owner could demolish the buildings and use the land unrestricted (to include hypothetically residential use and/or grazing).
4. Section 12.2, Cumulative Risk Evaluation, page 12-3. The methodology for the site attribution analysis is conservative and acceptable. If a site maximum is above the background reference value and sufficient data are available, a statistical comparison of the datasets may be conducted to see if the site data are statistically different from background. This step is not required, but it is an option available to refine inorganics carried forward in a risk assessment if needed.
5. Section 12.2, Cumulative Risk Evaluation, page 12-5. The soil leaching to groundwater should be evaluated at all sites, regardless of whether groundwater data are present. The purpose of this evaluation is to assess the potential for soil contamination to leach to groundwater. Use of groundwater data is a useful line of evidence to discuss whether site contamination has leached to groundwater but it does not address on-going issues or future potential for contamination.
6. Section 12.2, Cumulative Risk Evaluation, page 12-5. The use of the 95% upper confidence limit (UCL) for the beef ingestion pathway is deemed reasonable. While the first step in the risk screen is to use the maximum detected concentration, the guidance does allow

refinement using the 95% UCL. However, the risks calculating use the UCL must still be added to those risks based on the maximum detection for all other complete pathways.

Please also note, for several of the areas, the distribution of contamination may be limited to localized areas within the SWMU/AOC. In these cases, a qualitative assessment may be appropriate. For example, and as noted in Section 12.1 of the work plan, contamination in Igloo Blocks is limited to the doorways, entrance areas and aprons; contamination is not wide-spread across the Block. A spatial assessment of these data (amount of area contaminated versus size of the SWMU) would likely result in the beef pathway being incomplete. A similar qualitative assessment may be warranted for developed areas or other areas where the area of contamination represents a very small portion of the site (less than 2 acres). However, the risk assessments should include these qualitative discussions as applicable for each site in the reports.

7. Section 12.2, Cumulative Risk Evaluation, page 12-6. In step two (2) the toxic equivalent for dioxins/furans would be re-calculated using validated results. First, since the laboratory calculated TEQ does not include data validation, the use of it is not appropriate. Risk assessments should be conducted using 100% validated data. It is recommended that the TEQ be calculated using the validated congener data for use in the screening assessment, and not be used as a refining tool.
8. Section 12.2, Cumulative Risk Evaluation, page 12-6. In step three, an “alternate maximum concentration” may be selected. Please clarify the intent of this paragraph that if initial site data indicate corrective actions are warranted, and removals are conducted, the risk assessments will be refined using confirmation data.