



NEW MEXICO  
ENVIRONMENT DEPARTMENT



SUSANA MARTINEZ  
Governor

JOHN A. SANCHEZ  
Lieutenant Governor

2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303  
Phone (505) 476-6000 Fax (505) 476-6030

www.env.nm.gov

BUTCH TONGATE  
Acting Cabinet Secretary

J.C. BORREGO  
Acting Deputy Secretary

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

September 7, 2016

Mark Patterson  
FWDA, BRAC Coordinator  
P.O. Box 93  
Ravenna, OH 44266

Steve Smith  
USACE  
CESWF-PER-DD  
819 Taylor Street, Room 3B06  
Fort Worth, TX 76102

**SUBJECT: DISAPPROVAL  
FINAL INTERIM MEASURES WORK PLAN AREAS OF CONCERN  
AND SOLID WASTE MANAGEMENT UNITS IN THE KICKOUT AREA,  
FORT WINGATE DEPOT ACTIVITY  
MCKINLEY COUNTY, NEW MEXICO  
EPA # NM6213820974  
HWB-FWDA-16-006**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) has reviewed the *Final Interim Measures Work Plan Areas of Concern and Solid Waste Management Units in the Kickout Area* (Work Plan), dated July 5, 2016 from the Fort Wingate Depot Activity (Permittee). NMED hereby issues this Disapproval. The Permittee must address the following comments.

**GENERAL COMMENTS**

**1. References**

**NMED Comment:** There are numerous instances in the Work Plan where the reader is referred to external documentation for which no reference information is included in Section 11, References. In Section 1, Introduction, alone, there are approximately fifteen documents cited that are not included in the Reference section.

In addition, many of these instances do not present or summarize the relevant information found in the cited documents. This is most prevalent throughout Section 4.0, Field Investigation Plan. Project details must be included in the Work Plan rather than referenced to an external document. Documents previously reviewed and approved by NMED may be referenced, but the relevant information must be summarized in the text. Statements such as, “[c]onfirmation of the goals for the surface and subsurface MEC clearance will be IAW Section 3.2.7 of the Final Work Plan, Munitions and Explosives of Concern Removal and Surface Clearance, Kickout Area, dated February 2015 for which the NMED provided an Approval with Modifications letter on May 2015”, are not acceptable as a substitute for a detailed description of tasks to be performed in the field. The majority of Section 4 must be revised to include detailed descriptions of tasks proposed to be performed in the field. Complete review of the Work Plan cannot be completed until these tasks are described in the text.

Also, referenced documents that have not been submitted for regulatory review must be submitted to NMED as reference documents for the Administrative Record, and the information contained in the reference documents that is relevant to the project must be summarized in the text.

At a minimum, the Permittees must:

- revise the Work Plan to list all referenced documents in Section 11.0, References;
- revise the Work Plan to present the relevant referenced information in the text;
- submit all referenced documents that have not been submitted to NMED for the Administrative Record; and
- revise the Work Plan to provide detailed descriptions of all proposed work

## 2. Risk Assessment

**NMED Comment:** The discussion in Section 3.1.5, Exposure Pathways indicates that only direct contact pathways (dermal contact, incidental ingestion, and inhalation of volatilized constituents adsorbed to wind-blown dust particles) will be addressed in the Work Plan. Exposures to constituents in groundwater, the potential for migration of constituents in subsurface soils to groundwater (protection of groundwater), residential exposure via ingestion of beef, and risk to ecological receptors will be addressed “under separate scopes of work.” This approach is supported by the presentation of information in Figure 3-1, Conceptual Site Model – Schematic Wire Diagram, in which all information not addressed by the Work Plan is presented in gray. Section 3.3.2, Hierarchy for Determination of Cleanup Levels, also states that groundwater protection, residential exposure via ingestion of beef, and consideration of ecological receptors will be addressed under separate scopes of work.

A comprehensive human health risk assessment report addressing all exposure pathways, including protection of groundwater, is still required and must be submitted to NMED; it is recommended that the cumulative assessment be provided with the Kickout Area Interim Measures Report because assessment of the adequacy of removals cannot be determined until the risk assessments are complete. Further, approval of the completion of the interim

measures will not be granted until the risk assessments are complete and it can be demonstrated that there are no adverse risks to human health, the environment, and/or potential for degradation of groundwater due to residual levels of contamination. The comprehensive report is needed to demonstrate the level of cumulative risk to receptors due to contamination at the Areas of Concern (AOCs) and Solid Waste Management Units (SWMUs) associated with the Kickout Area. It is understood that this approach is based upon recently submitted papers by FWDA to NMED addressing specific scenarios. One paper recently submitted by FWDA addressing the beef ingestion pathway indicated that the beef pathway was incomplete and/or an insignificant pathway for the FWDA and did not require analyses on a site-specific basis. FWDA also submitted a similar paper on facility-wide ecological risk assessments, indicating the site-specific ecological assessments were not required. NMED does not agree with either of the approaches/conclusions and requires FWDA to evaluate all receptors and pathways on a site-specific basis. NMED has clearly indicated to FWDA that the beef ingestion pathway and ecological risks must be evaluated on a site-specific basis.

For the AOCs and SWMUs addressed in this Work Plan, AOCs 91 and 92 and SWMUs 14, 15, and 74 are of sufficient acreage to require evaluation of the beef ingestion pathway. Residual contamination in soil must be compared to the preliminary remediation goals for beef ingestion and risks/hazards included in the cumulative assessment. In addition, if any soil is removed and screened for re-use at the sites, the soil must be evaluated to ensure any residual levels of contamination meet cumulative risk for all pathways (including beef ingestion, if appropriate).

The Interim Measures (IM) report must provide an estimate of cumulative risk to receptors before any remedial actions (e.g., the interim measures addressed in the Work Plan) as well as an estimate of the cumulative risk to receptors due to residual contamination after completion of all remedial actions performed under the separate scopes of work. It is also recommended that the ecological risk assessment (conducted in accordance with the NMED Soil Screening Guidance) be included in the comprehensive report. Revise Section 3.0 of the Work Plan to indicate that a comprehensive risk assessment report that addresses cumulative risk stemming from exposures at the AOCs and SWMUs in the Kickout Area and based on the conceptual site model (CSM) presented in Figure 3-1 will be prepared and submitted to NMED once the separate scopes of work noted in Section 3.1.5 are completed.

Further, evaluation of the soil-to-groundwater screening levels (SSL) is important in assessing whether sufficient contamination has been removed. For explosives in particular, the SSL will often drive removals due to the high mobility of some explosives and the resulting SSLs are more conservative than the residential levels. It is recommended that evaluation of the SSLs be included in the revised Work Plan to ensure removals are adequately characterized and to prevent multiple mobilization efforts.

### **Specific Comments**

#### **3. Section 1.2, Project Purpose and Scope**

**Permittee's Statement:** "Additionally, the scope includes the excavation and removal of metallic debris, waste, and contaminated soil from designated burial pits located in SWMU 14, 15, 33, and SWMU 14 arroyo. The depths of the subsurface removal within these areas will vary based on visual observations of MEC [munitions and explosives of concern] and MPPEH [material potentially presenting an explosive hazard], followed by confirmation sampling results indicating that excavation is complete."

**NMED Comment:** Based on the information furnished in the Work Plan, it is unclear how use of visual observations is sufficient to identify subsurface MEC and MPPEH. Surface patterns of MEC/MPPEH are not considered reliable in estimating subsurface items, given the long history of use at these sites. Typically, subsurface MEC investigations are conducted using geophysical support. While use of geophysical support and other methods may be contained in support documents not provided with the Work Plan, Section 1.2 must be revised to include lines of evidence that support the use of visual observations as the only means of identifying MEC and MPPEH in the subsurface.

#### **4. Figure 3-1, Conceptual Site Model – Schematic Wire Diagram, p 3-3**

**NMED Comment:** The figure notes that "Grayed CSM items are not included in this Interim Measures Work Plan." The CSM includes two release mechanisms that have been grayed. One of the mechanisms is Leaching; the other is illegible. Revise Figure 3-1 so that all grayed release mechanisms are legible.

#### **5. Figure 3-1, Conceptual Site Model – Schematic Wire Diagram, p 3-3**

**NMED Comment:** Figure 3-1 indicates that the exposure media for potential receptors is surface soil from 0-6 inches below ground surface (bgs). The soil exposure interval for residents and construction workers is 0-10 feet bgs, in accordance with the NMED Soil Screening Guidance. While the discussion in Section 3.1.4, Receptors, indicates that risks from soil will be assessed from 0-10 feet bgs for all human receptors, the information provided in the text and figure regarding the depth interval for soil exposures must be reviewed and revised to eliminate inconsistencies.

#### **6. Section 3.1.3, Fate and Transport, p 3-4**

**Permittee's Statement:** "Site-specific soil conditions are more likely to be dry and alkaline indicating metals should be relatively adsorbed to the soil and not be very mobile."

**NMED's Comment:** The Work Plan offers no information in support of this assertion. While this chemical behavior may occur in stable environments, mobilization of metals and other contaminants at depth has been noted in areas of similar history to the AOCs/SWMUs

being addressed in this Work Plan. For example, AOC 92 had 38 years of open burn/open detonation (OBOD) operations and SWMU 15 had years of OBOD operations. Continued open detonations will force contamination downward. For SWMU 14, where disposal of TNT-containing washout and for AOC 90 (ponds), liquid sources would likely mobilize metals more readily than natural conditions in an arid environment. Thus, the conclusion that metals are immobile does not appear justified. A reference citation must be provided to site documentation that establishes that site soils are dry and alkaline in nature and that past history (liquid and OBOD operations) would not impact the mobilization of metals in soil. Revise the last sentence in Section 3.1.3 to include a reference citation to site-specific documentation and provide additional lines of evidence based on the site's past operating history that demonstrate the immobility of metals in soil. In addition, ensure that the cited documentation is listed in Section 11.0, References, of the Work Plan.

#### **7. Section 3.1.4, Receptors, p 3-4**

**Permittee's Statement:** "For the purposes of this IM WP, surface soil is defaulted to 0 - 10 feet bgs for all human receptors."

**NMED's Comment:** As indicated in Section 3.1.4, the NMED SSG recommends that a depth interval for soil of 0-1 foot bgs be used when determining exposure to soil contamination for commercial and industrial workers. Section 3.1.4 should explain why the soil depth interval recommended for commercial/industrial workers is not applicable to the Work Plan as it is unclear whether the assumption represents a conservative approach for assessing risks to commercial/industrial workers. The concern is that evaluating a larger exposure interval may not be protective of the industrial worker, especially in cases where soil is not being removed. A higher density of contamination in near surface soil could result in a higher exposure point concentration (EPC) than an EPC determined over a larger soil interval. In addition, the discussion should include lines of evidence supporting the use of a soil depth interval of 0-10 feet bgs for commercial/industrial receptors in the Kickout Area. Revise Section 3.1.4 to address these issues related to the assumed soil depth interval for estimating exposures to commercial/industrial workers.

#### **8. Section 3.3.3, Process for Data Evaluation, Step 3, p 3-7**

**Permittee's Statement:** "If the maximum concentration of any COPC is above its respective cleanup level and the data set meets the minimum requirements for calculation of upper confidence limits (UCLs) [per Section 2.7.7 of NMED's Risk Assessment Guidance for Site Investigations and Remediation, each data set must contain at least eight samples and there must be a minimum of six detections], then the 95% UCL will be calculated using ProUCL Version 4.1."

**NMED's Comment:** ProUCL Version 5.1 is now available and should be used by FWDA for calculating 95% UCLs. Revise the discussion of Step 3 to indicate that ProUCL Version 5.1 (or most current) will be used to calculate 95% UCLs.

**9. Section 3.3.4, Risk Reporting, p 3-8**

**NMED's Comment:** As noted in previous comments, it is advised that the IM Completion Report include all pathways for all receptors in the cumulative risk assessment (human health and ecological). However, if FWDA still chooses to provide separate reports for different aspects of the risk assessment, the discussion of risk reporting on pages 3-8 and 3-9 must be revised to indicate that the IM Completion Report will state that all pathways applicable to the Kickout Area were not addressed in the IM. In addition, the revised text must indicate that a comprehensive assessment of cumulative risk addressing all applicable pathways will be submitted to NMED once all the scopes of work applicable to the Kickout Area are completed.

**10. Section 4.1.2, Munitions and Explosives of Concern Clearance in Areas of Concern and Solid Waste Management Units Outside Waste Burial Pits, p 4-4**

**Permittee's Statement:** "The grid, minus the area of the waste burial pit, will be turned over to the Army for QA [quality assurance] following QC [quality control] of the grid(s)."

**NMED's Comment:** The intent of this sentence is unclear as the QC performed on the grids and the QA that will be performed once a grid is turned over to the Army have not yet been explained in the text. An explanation is offered in Note 1 of Section 4.2.5.3, Defining Acceptance of the Cleanup Criteria (page 4-10). Revise Section 4.1.2 to refer to Note 1 of Section 4.2.5.3 for a description of QC inspection that will be performed on the grids and the QA (independent inspection) activities that will be performed when a grid is turned over to the Army. In addition, the discussion should be revised to demonstrate that the Army staff conducting the QC inspection and the staff conducting the QA inspection are independent.

**11. Section 4.1.7, Maintenance of Roads, p 4-6**

**Permittee's Statement:** "The sediment may potentially contain MEC, and the Army will use UXO [unexploded ordnance] construction support in working in and around the sediment."

**NMED's Comment:** The Work Plan does not describe the type(s) of assistance that UXO construction support will provide. Revise Section 4.1.7 to include a description of the activities that UXO construction support may perform during road maintenance when addressing sediment potentially contaminated by MEC.

**12. Section 4.2.5.2, Establishing Clean up Criteria, Item 2 p 4-9**

**Permittee's Statement:** "Areas of the arroyo that are not in a designated waste burial pit but have surface or near surface MEC and debris will be cleared of MEC and debris to the visual inspection criteria but will not be sampled. Non burial pit areas may be characterized during the Parcel 3 RFI [RCRA facility investigation]."

**NMED's Comment:** It will be necessary to characterize non burial pit areas as part of the IM or the Parcel 3 RFI to determine if contamination stemming from the removed MEC and debris remains in the soil. Revise Item 2 of Section 4.2.5.2 to indicate that non burial pit areas from which MEC and debris were removed will be characterized as part of the Parcel 3 RFI or IM.

**13. Section 4.2.5.3, Defining Acceptance of the Cleanup Criteria, Item 2, p 4-10**

**Permittee's Statement:** "When it is determined that remaining soil represents an acceptable risk/hazard based on human health direct contact, the Army will provide the NMED, via email, a brief summary of the validated data with the results of the risk/hazard evaluation. The NMED acceptance of the data, combined with a signed ENG. Form 6048 stating the area meets the NMED cleanup criteria will be the notice to proceed with backfilling."

**NMED's Comment:** NMED does not provide acceptance or approvals of a "brief summary of validated data" for each excavation, or area of excavation, during the project field work. NMED only approves or disapproves the interim measures based on a comprehensive report and risk assessment following completion of the interim measure (see previous comments). The decision to proceed with backfilling must not be based on acceptance of data by NMED; the decision to proceed is the responsibility of the Permittee, not NMED. Remove this statement from the Work Plan.

**14. Section 4.7.9.6, Sorting/Inspection Area (SIA), p 4-24**

**Permittee's Statement:** "The material generated as a result of the mechanized MEC removal and processing operations (as described in the Section 4.7.9.5) will be further processed in the SIA and inspected in the Inspection Area, the locations of which are shown on Figure 4-1. In addition to the SIA and Inspection Area footprints, the space between the SIA and Inspection Area and north-northwest of the road that traverses SWMU 15, will be used to stage processed material/soil generated from the SIA operations."

**NMED's Comment:** The terminology used to describe two different areas above is confusing to the reader. The Permittee describes a sorting and inspection area and then describes a second area as an inspection area. The Permittee must utilize an alternate term for the name of one of the two different areas so that they can be clearly differentiated. Revise the Work Plan accordingly. In addition, describe the methods for evaluating the sifting and inspection areas after operations have been completed.

**15. Section 4.7.9.6.1, Sorting/Inspecting Equipment**

**NMED's Comment:** The discussion in the first paragraph of Section 4.7.9.6.1 (page 4-24) indicates that the Sorting/Inspection Area (SIA) processes are equipped with three special features. The first, SIA Plant Start/Shutdown Switches is presented and discussed under Item 1 at the bottom of page 4-24. The other two features, Emergency Shutdown Safety Switches and a Multi-camera Video System, are described in Items 1 and 2, respectively, at the top of

page 4-26. It is likely that the items at the top of page 4-26 are numbered incorrectly and should be re-labeled as Item 2 and Item 3. Review this information and revise the item numbers on page 4-26 as necessary.

**16. Section 4.7.9.7, Munitions and Explosives of Concern and Debris Removal from Arroyo Floors and Walls, p 4-30**

**Permittee's Statement:** "The Army will conduct a detailed engineering evaluation in order to define areas of this arroyo that are safe for personnel to enter and determine safe stand-off distances for excavation and EMM working near the arroyo."

**NMED's Comment:** The text does not indicate when this evaluation will be performed. In addition, performance of the engineering evaluation is not listed among the bulleted tasks presented in Section 4.1.1 of the Work Plan. Revise Section 4.7.9.7 to indicate when the engineering evaluation will be performed and how the results of the evaluation will be communicated to all stakeholders. In addition, ensure that the engineering evaluation is added to the list of tasks presented in Section 4.1.1.

**17. Section 4.7.9.7.1, Arroyo Area Management**

**NMED's Comment:** Section 4.7.9.7.1 indicates that the arroyo has been separated into three primary areas. The text notes that Area 2 has an extremely high density of MEC, MPPEH, and waste military munitions and that it is likely that the area will be cleared by mechanical means. However, the discussion notes that if areas of the arroyo are safe to enter and work, a manual "mag and dig" clearance may be conducted to maintain the integrity of the arroyo walls and floor. Based on the information provided, it is unclear how the decision to conduct a mechanical removal or a manual "mag and dig" will be made. In addition, it is unclear when the decision will be made. Revise the discussion of Area 2 to include the criteria to be applied in determining if a mechanical removal, a manual "mag and dig", or a combination of both should be conducted. In addition, state when the decision on the type of removal will be made (e.g., after the Army's engineering evaluation).

**18. Section 4.7.9.7.1, Arroyo Clearance, p 4-35**

**NMED's Comment:** The Section discussing Arroyo Clearance should be relabeled as Section 4.7.9.7.2. This typographical error was also perpetuated through the mislabeling of the subsequent sections. Revise the Work Plan to correct these errors.

**19. Section 4.7.9.7.1, Arroyo Clearance, p 4-35**

**Permittee's Statement:** "Any visually impacted material will be removed from the arroyo clearance and handled the same as the excavated MEC and WMM scrap material removed as described in Section 4.7.9.5. Specifically, the material and will be taken to the SIA for processing or directly to the Inspection Area as described in Section 4.7.9.6."



**NMED's Comment:** This paragraph is confusing and should be rewritten. For example, the first sentence refers to "visually impacted material". It is likely that the quoted phrase should read "visually identified material". Revise the entire paragraph for improved clarity.

#### 20. Section 4.13.1, Confirmation Soil Sampling, p 4-43

**Permittee's Statement:** "For the DU excavated at AOC 92, composite confirmation samples will be collected from the bottom only. No sidewall samples will be collected since the soil removal area (if required) included in this IM WP scope will only be six inches deep. Each composite sample will consist of nine subsamples randomly collected within the DU and analyzed for explosives, TAL metals, and perchlorate. Locations for the composite sample increments will be collected by dividing the DU into 9 subgrids. The location of the first increment will be determined by sampling personnel walking to a random location within one subgrid, and subsequent increments will be collected at the same relative location within each additional subgrid. In addition, one discrete sample will be collected from the DU for SVOC analysis."

**NMED's Comment:** The proposed sampling approach is not in accordance with EPA Method 8330B, Appendix A for multi-incremental sampling. Propose to conduct multi-incremental sampling in accordance with EPA Method 8330B, Appendix A or provide justification for using an alternate approach. In addition, the rationale for collecting a single discrete sample for SVOCs is not provided. Revise the Work Plan to propose multi-incremental sampling as referenced above and explain the rationale for utilizing a discrete sample for analysis of SVOCs.

#### 21. Section 4.13.2, Sifted Soil Confirmation Sampling, p 4-51

**Permittee's Statement:** "One composite sample will be collected for approximately every 500 cubic yards of sifted soil. The composite sample will consist of grab sub-samples collected as the sifted soil pile is generated. When the pile is determined to be approximately 500 cubic yards, the subsamples will be homogenized and one composite sample will be placed in a clean sample jar and managed in the same manner as the confirmation samples."

**NMED's Comment:** The discussion does not indicate if the sub-samples should be collected from specified or random locations. Revise the Work Plan to furnish additional details regarding the collection of grab sub-samples from the piles of sifted soil. If this information is provided in Appendix A (e.g., Worksheet #17 of the UFP-QAPP), a reference to the discussion will suffice in addressing this issue.

Also, one composite sample for approximately every 500 cubic yards of sifted soil is insufficient. One composite sample must be collected for every 250 cubic yards. Revise the Work Plan to indicate that a sample rate of one composite sample 250 cubic yards will be collected to characterize the sifted soils.

**22. Section 4.13.5, Sample Identification, Chain-of-Custody, Packaging, and Shipping Procedures, Field Quality Control Samples, p 4-53**

**Permittee's Statement:** "No field duplicates will be collected/analyzed during soil confirmation sampling."

**NMED's Comment:** Field duplicates are an integral component of any environmental sampling program and must be collected during soil confirmation sampling. Typical field duplicate collection rates require a minimum of 10% duplicates. Revise the Work Plan to include a standard field duplicate collection procedure for all sampling to be conducted under the scope of work.

**23. Section 4.13.8.1, Data Security, p 4-56**

**Permittee's Statement:** "Measures will be taken during the field investigation to confirm that samples and records are not lost, damaged or altered."

**NMED's Comment:** The discussion does not identify the measures that will be employed to ensure samples and records are not lost, damaged, or altered. Revise the Work Plan to list and discuss the controls and/or procedures that will be used to ensure samples and records are not lost, damaged, or altered.

**24. Section 4.13.11, Data Analysis, Usability, and Reporting, p 4-57**

**Permittee's Statement:** "The data management system will be used to generate tables of analytical results from the project database as part of data interpretation tasks and generation of reports. The analytical data tables will include: sample identification, date collected, analytical method, matrix, CAS number, analyte, result, reporting limit, units, lab qualifier, screening level source, screening level value, units, and whether the screening level has been exceeded using a yes or no entry."

**NMED's Comment:** Based on the description provided, it appears that the tables may be overly complex if all information is to be presented in a single table. It is recommended that separate tables be generated for sampling information (e.g., sample identification, date collected), analytical and laboratory information (e.g., analytical method, matrix, reporting limit, laboratory qualifiers), and risk assessment information (e.g., screening level source, screening level, indicator of exceedance of screening level). Revise the discussion of the analytical data tables to indicate that the types of information listed will be presented in more than one table.

**25. Section 4.13.13, Decontamination Procedures, p 4-58**

**NMED's Comment:** Section 4.13.13 provides information on decontamination procedures. However, much of the information provided is general in nature. Additional details are available in MC SOP No. 1, Field Equipment Decontamination, included in Appendix A.1,

Messrs. Patterson and Smith

September 7, 2016

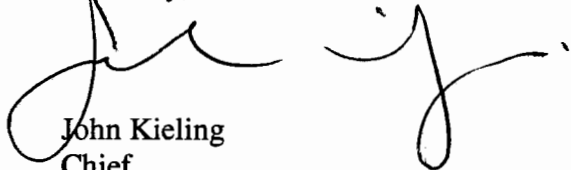
Page 11

Field SOPs, of the Work Plan. Revise the Work Plan to include a reference to MC SOP No. 1 in Appendix A.1 for additional details regarding decontamination of field equipment.

The Permittee must submit a revised Work Plan that addresses all comments contained in this Disapproval. In addition, the Permittee must include a response letter that cross-references where NMEDs numbered comments were addressed. The Permittee must also submit an electronic redline-strikeout version of the revised Work Plan showing where all changes have been made to the Work Plan. The revised Work Plan must be submitted on or before **December 30, 2016**.

Should you have any questions, please contact Ben Wear of my staff at (505) 476-6041.

Sincerely,



John Kieling  
Chief  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
N. Dhawan, NMED HWB  
B. Wear, NMED HWB  
C. Hendrickson, U.S. EPA Region 6  
T. Perry, Navajo Nation  
V. Panteah, Zuni Pueblo  
C. Seoutewa, Southwest Region BIA  
R. Duwyenie, Navajo BIA  
J. Wilson, BIA  
E. Stevens, BIA  
R. White, BIA  
C. Esler, Sundance Consulting, Inc.

File: FWDA 2016 and Reading, KOA SWMUs AND AOCs, FWDA-16-006