State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6313
Phone (505) 476-6000 Fax (505) 476-6030
www.env.nm.gov

SUSANA MARTINEZ
Governor
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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

February 7, 2018

Mark Patterson
BRAC Environmental Coordinator
Fort Wingate Depot Activity
13497 Elton Road
North Lima, OH 44452

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

RE: DISAPPROVAL
FINAL WORK PLAN INNER FENCE PARCEL 3, REVISION 1.0
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-17-001

Dear Messrs. Patterson and Smith

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *Final Work Plan Inner Fence Parcel 3, Revision 1.0* (Work Plan), dated November 29, 2017. NMED has reviewed the Work Plan and hereby issues this Disapproval. The Permittee must address the following comments.

1. Table of Contents, List of Acronyms

NMED Comment: Definitions for some acronyms (e.g., HTRW, HNC, NONEL, UXOQP) are not provided in the Work Plan. Each acronym must be defined in the text or the document, *List of Acronyms*. Revise the Work Plan to provide definitions for these acronyms.

2. Section 1.2.1.4, Section IV.D Kickout Area Clearance Report, lines 2-4, page 1-3

Permittee Statement: "Within 180 days of the completion of the KOA investigation, clearance, and removal of WMM and WMM scrap from the KOA, the Army will provide the NMED a report summarizing the results of this work."

NMED Comment: Field work will be completed on November 20, 2019 and report preparation will start on January 27, 2022 according to Figure 2-2, *Project Schedule*. No activities are scheduled in 2020 and 2021 according to Figure 2-2. As the Permittee intends to provide NMED a report within 180 days of field work completion, the report pertaining to the investigation and removal activities in the Inner Fence Area must be submitted by May 20, 2020. Correct the discrepancy or explain why no activities are proposed in the 2020 and 2021 schedule in the revised Work Plan.

3. Section 1.3, Investigation and Clearance Summary, lines 30-32, page 1-3

Permittee Statement: "MPPEH and MD inspection, handling, and final disposition as MDAS will be conducted IAW USACE EM 385-1-97, Change 1, DoD 4140.62, and DoD 6055.09-M."

NMED Comment: NMED does not review the referenced engineering manuals. The Permittee must describe the process for how materials documented as an explosive hazard (MDEH) and safe (MDAS) are inspected and separated from material potentially presenting an explosive hazard (MPPEH) in the revised Work Plan.

4. Section 3.1, Overall Approach to Munitions Response Activities, lines 7-8, page 3-1

Permittee Statement: "The removal will not occur in areas too steep to safely work as shown on Figure 1-2."

NMED Comment: If inaccessible areas are encountered during the investigation of the Inner Fence Area, use Figure 3-1, *Inner Fence Area Grid Map*, to depict areas where field investigation and removal of debris are not conducted. Present the map in future reports.

5. Section 3.4, Instrument Test Strip, lines 23-25, page 3-4

Permittee Statement: "The purpose of the ITS is a QC measure demonstrating the functionality of the detection equipment being used during the RA operations and the ability of the equipment operator to detect items that may be encountered in the field."

NMED Comment: The results of the detection and recovery test must be presented in the Kickout Area Clearance Report (KOA Report). Indicate each test result with depths, soil

types, orientation and size of the object. In addition, the Permittee must determine the maximum depths that the instrument is capable of detecting each object listed in Table 3-2, *Equivalent ISO Simulant Items* under typical subsurface conditions in the Inner Fence Area. In Section 3.1, *Overall Approach to Munitions Response Activities*, lines 34-35, page 3-1, the Permittee states, "[i]n general, the depth of detection utilizing hand-held detectors is 11 times the diameter of the item." The statement may or may not be accurate under certain subsurface conditions; thus, it must be verified by an actual instrument at the site. No revisions to the Work Plan are necessary.

6. **Section 3.5, Location Surveys and Mapping Plan, 14-16, page 3-5**

Permittee Statement: "All grid corner stakes will be painted orange, yellow stakes will be used for line of sight, white stakes will be used for MRS boundaries, and red stakes (or pin flags, flagging, or marking paint) will be used to mark areas to be avoided due to hazardous conditions."

NMED Comment: The paint must not contain constituents that may interfere with confirmation sample analysis. No revisions to the Work Plan are necessary.

7. **Section 3.12.5.1, Confirmation Soil Sampling Method, lines 24-26 and lines 36-37, page 3-25, and lines 10-11, page 3-26**

Permittee Statements: "Samples will be collected from the bottom and sidewalls of each excavation. Each excavation will likely vary significantly in shape and size; therefore, a composite sample will be collected from at least every 100 linear feet of sidewall."
"A composite sample will be collected from the bottom of each excavation that is less than 100 feet by 100 feet (10,000 square feet)."
"Each sample will be comprised of nine subsamples randomly collected from within each sampling area."

NMED Comment: The analytical suite for confirmation soil sampling must include target analyte list (TAL) metals, semi-volatile organic compounds (SVOC), explosives, polychlorinated biphenyl (PCB), nitrate, cyanide, dioxins/furans and perchlorate. For areas where excavation exceeds two feet in depth, the sampling protocols used for the HWMU removal must be followed. For areas where the excavation is less than two feet in depth, nine subsamples to make up a composite sample are sufficient to characterize decision units of less than 1,000 square feet. For shallow excavations greater than 1,000 square feet, each composite sample must be comprised of a minimum of 50 subsamples and exceed a mass of one kilogram in accordance with Section 6.1 of Attachment 9 of the Permit and EPA Method 8330B, respectively. For both composite and incremental samples, the initial screening must compare the detected concentration multiplied by the number of subsamples to the compound-specific screening level. Revise the Work Plan accordingly.

8. Section 3.12.5.1, Confirmation Soil Sampling Method, lines 24-26 and lines 36-37, page 3-25, and lines 5-6, page 3-26

Permittee Statements: "Samples will be collected from the bottom and sidewalls of each excavation. Each excavation will likely vary significantly in shape and size; therefore, a composite sample will be collected from at least every 100 linear feet of sidewall."
"A composite sample will be collected from the bottom of each excavation that is less than 100 feet by 100 feet (10,000 square feet)."
"Each sample area will consist of one discrete soil sample for volatile organic compounds (VOCs) (Method 8260B) and…"

NMED Comment: The Permittee proposes to collect a discrete sample at least every 100 linear feet of the sidewalls and 10,000 square feet of the bottom; however, the number of discrete sample is not sufficient to characterize either bottom and sidewalls of each decision unit. For VOC analysis, a discrete sidewall sample must be collected every twenty linear feet of the sidewalls and a discrete base sample must be collected every 400 square feet of the bottom. Revise the Work Plan accordingly.

9. Section 3.13, Backfilling Excavations, lines 7-8, page 3-29

Permittee Statement: "All excavations created from excavation of anomalies, detonations, and access will be backfilled and restored to original grade."

NMED Comment: Clarify the source of the backfill (e.g., soil generated from the shifting operation that has been determined to be acceptable for use as backfill).

10. Table 3-1, Type and Depth of MEC Removed

NMED Comment: The variety of recovered MEC items, from 20mm to a 2000-lb bomb, are listed in Table 3-1. The recovered MEC items may exhibit a large range of detection depths; however, Table 3-1 lists only one detection depth. In addition, the listed depths of "~ < 2 feet" and "~ < 4 feet" are confusing because they may mean anything less than 2 feet and 4 feet, respectively. Further, the Permittee must clarify whether the table includes or excludes recovery depths from the HWMU remediation area. Divide Table 3-1 into several groups by munition detection depth ranges in the revised Work Plan.

11. Figure 3-1, Inner Fence Area

NMED Comment: If "HWMU-like" surface and subsurface conditions are identified at the outermost decision unit along the fence line depicted in Figure 3-1, the adjacent soils outside of the decision unit along the fence line must be investigated in the same manner, where practicable. Although the scope only focuses on the investigation and removal activities

within the Inner Fence Area, the Permittee must include a measure to address contaminated soils outside of the fenced area where contamination is detected. The same grid system (e.g., 100 feet by 100 feet) may be established along the fence line, adjacent to the outermost decision unit. Revise the Work Plan to address potential soil contamination outside of the Inner Fence Area.

12. The Permittee's Response to Comment 2 of the Disapproval

Permittee Statement: "Appendix F of the WP was removed as indicated in the response above."

NMED Comment: The Permittee's statement was removed; however, this Work Plan may be developed based on the inappropriate direction stating that soil sampling should not be unnecessarily completed if receptor pathways are incomplete. The Work Plan must be revised to address all potential exposure pathways that were not previously addressed. It should be noted that simply removing an inappropriate statement from the text may not entirely comply with the NMED's directions. Revise the Work Plan as necessary.

13. The Permittee's Response to Comment 7 of the Disapproval

Permittee Statement: "The schedule in Appendix C was revised to only include tasks related to the Inner Fence work. Also, the project schedule was moved into the main body of the work plan."

NMED Comment: Figure 2-2, *Project Schedule,* includes columns for "Task" and "CLIN"; however, they are not defined. The Permittee must either remove these columns from the figure or provide definitions in the revised Work Plan.

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 NMED's numbered comments were addressed. The Permittee must also submit an electronic redline-strikeout version of the revised Work Plan showing all changes that have been made to the Work Plan. The revised Work Plan must be submitted no later than **August 1, 2018**.

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

Sincerely,

John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
B. Wear, NMED HWB
M. Suzuki, NMED HWB
C. Hendrickson, U.S. EPA Region 6
L. Rodgers, Navajo Nation
S. Begay-Platero, Navajo Nation
M. Harrington, Pueblo of Zuni
C. Seoutewa, Southwest Region BIA
R. Duwyenie, Navajo BIA
J. Wilson, BIA
B. Howerton, BIA
R. White, BIA
C. Esler, Sundance Consulting, Inc.

File: FWDA 2018 and Reading, Parcel 3, FWDA-17-001