



DEPARTMENT OF THE ARMY
OFFICE OF THE DEPUTY CHIEF OF STAFF, G-9
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

April 30, 2024

Army Environmental Division- BRAC Operations Branch

Mr. Ricardo Maestas
Acting Chief, Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

RE: Final RCRA Facility Investigation Report, Parcel 22, May 31, 2015, Fort Wingate Depot Activity, McKinley County, New Mexico. EPA# NM6213820974

Dear Mr. Maestas:

This letter provides responses to the comments issued in the Notice of Disapproval (NOD) letter from the New Mexico Environment Department (NMED) dated May 10, 2018, HWB-FWDA-17-003 for the Final RCRA Facility Investigation Report, Parcel 22 Revision 2. This letter also describes a Phase 2 RFI Work Plan being submitted under separate cover that addresses some of the comments in the 2018 NOD.

GENERAL COMMENTS:

1. Appendices

NMED Comment 1: NMED did not review and does not provide approval for:

- Appendix C, Cultural Resources Programmatic Agreement
- Appendix M, SWMU27 Building 551 Post-Demolition Sampling Report
- Appendix N, USACE Sampling and Analysis Plans for AOC 30
- Appendix O, Aquifer Test Package

NMED has previously directed the Permittee to not include full documents or reports as appendices. Full documents or reports must be submitted to NMED separately as supporting documents that can then be referenced in investigation work plans and reports. In addition, NMED has repeatedly provided comments regarding the disorganized nature of the Permittee's document appendices and the problems inherent in providing appendices within appendices. For example, Comment 11 from NMED's November 1, 2016 Disapproval Final Interim Measures Work Plan Parcel 21 - Solid Waste Management Unit 1 - TNT Leaching Beds states,

The labeling of appendices within the appendices is confusing for a reviewer. For example, Appendix A contains an Appendix A. Provide a logical nomenclature for appendices within another appendix. For example, Appendix A-1, A-2, etc.

In addition, the page numbering of Appendix A is repetitive and confusing. For example, there are five pages numbered 1 (one) in the Appendix and several pages with no numbers at all. All Appendices must be presented with properly numbered pages.

Remove all extraneous appendices from the Work Plan. Label sub-appendices within appendices appropriately. Ensure all appendices contain sequentially numbered pages for review. Revise the Work Plan to correct these issues. These recurring issues have repeatedly been brought to the Permittee's attention and must be addressed in all future document submittals. If corrections are not made in future submittals, the submittals may be rejected.

Permittee Response: Concur. Extraneous appendices will not be included in the combined Phase 1 and Phase 2 RFI Report that will be submitted following implementation of the Phase 2 RFI Work Plan.

2. Section 3.4.1.4, Building 535, page 3-10

NMED Comment 2: The Permittee failed to collect a sample at the water table beneath the concrete sump at Building 535 as directed in Comment 10 of the NMED Disapproval for RCRA Facility Investigation Work Plan for Parcel 22 (2009 Disapproval), dated June 22, 2009. The same direction was emphasized in Comment 4 of the NMED Approval with Modification for RCRA Facility Investigation Work Plan for Parcel 22 (2010 AWM), dated January 28, 2010. The comment states that the Permittee proposed to collect a sample at five feet beneath the concrete sump but did not propose to collect a sample at the water table, and must adhere to all of the requirements in Comment 10 of the 2009 Disapproval by collecting a soil sample at the water table. During this soil investigation, the Permittee collected a sample at a depth of five feet beneath the concrete sump as proposed; however, the Permittee failed to collect a sample at the water table. Propose to collect a soil sample beneath the sump pit at the water table in a Phase 2 RFI Work Plan. Failure to address NMED comments by the Permittee is a recurring issue. As a cost-saving measure, the Permittee must resolve the issue (e.g., more thorough communication with contractors).

Permittee Response: Concur. The following text has been included in Section 3.5 of the Phase 2 RFI Work Plan for Parcel 22: *"The Army will collect a soil sample from above the water table beneath the sump located on the northeast corner of Building 535 (2212SUMPPIT-SB25-xx-xxD-SO on Figure 3.3), where "xx-xx" indicates the top and bottom depths of the sample collected) to address Comment 2 of the disapproval letter (NMED, 2018) for the 2015 RFI Report and Comment 10 of the disapproval letter for the RFI Work Plan (NMED, 2009). A soil boring will be installed at the location of the Building 535 sump and advanced until the water table is encountered or to refusal at bedrock. If the water table is encountered, a soil sample will be collected directly above the water table. If bedrock is encountered before the water table, the sample will be collected directly above the bedrock surface. The sample will be analyzed for DRO and SVOCs."*

3. Section 3.6.2, Soil Characterization, page 3-13

Permittee Statement: "The Army recommends removing and properly disposing the sediment from manholes F-1 and F-2 and to collapse and fill both manholes."

NMED Comment 3: NMED concurs with the Army's recommendations; however, a discrete soil sample must be collected and analyzed from the native soil directly beneath the bottom of each manhole before filling. The soil sample must be analyzed for SVOCs, explosives, VOCs, nitrate, perchlorate, TAL metals, and PCBs. If the contaminant concentrations exceed the screening criteria, the Permittee must remove additional soil until the residual contaminant concentrations are below the screening criteria. Once all concentrations are below the screening criteria, the manholes can then be backfilled. Include a detailed description of the procedure in the Phase 2 RFI Work Plan.

Permittee Response: The Army is proposing to defer the removal and subsequent sampling of manholes F-1 and F-2 until the completion of this RFI. The following text has been added to Section 3.5 of the Phase 2 RFI Work Plan for Parcel 22: "*The Army recommended, in Section 3.6.1 of the RFI Report (USACE, 2015), the removal and proper disposal of the sediment from manholes F-1 and F-2 (Figure 2.1) and to collapse and fill both manholes. NMED agreed with this recommendation and requested in the disapproval letter (Comment 3, NMED, 2018) for the 2015 RFI Report that samples be collected from the soil beneath the manhole and analyzed for SVOCs, explosives, VOCs, nitrate, perchlorate, TAL metals, and PCBs. This remedial action will be recommended in the Phase 1 and Phase 2 RFI Report and will be addressed in a Corrective Action Plan following completion of the RFI (see Table 1.1).*"

4. Section 4.4.2, Soil Investigation, page 4-13

Permittee Statement: "Samples were collected from the surface (nominally 0 to 3-inch depth interval, sample suffix: AM-SO) with a decontaminated stainless steel spoon or disposable plastic trowel) and 1 ft depth (nominally 10 to 14-inch depth interval, sample suffix: BM-SO) with a decontaminated stainless steel hand auger or GeoProbe™."

NMED Comment 4: According to Comment 23 of the 2009 Disapproval, the subsamples should have been collected from two to six inches bgs rather than zero to three inches bgs. The Permittee must collect shallow multi-incremental (MI) subsamples from two to six inches for future MI sampling events if approved by NMED. In addition, photograph 5-43 shows drilling equipment used for the MI sampling. The equipment is not a GeoProbe™ unit. The equipment appears to be a hollow stem auger. Clarify whether hollow stem auger was used for the sampling; if so, the samples could have been contaminated with drill cuttings from other depths. If hollow stem auger was used, propose to collect the MI samples with appropriate equipment in a Phase 2 Work Plan or provide an explanation for the variance in the revised Report.

Permittee Response: Concur. The Army is not proposing to collect additional MI samples as part of the Phase 2 RFI Work Plan at Parcel 22. However, the substance of the comment, including the sample depths and equipment concerns, have been incorporated into the sampling design proposed in the Phase 2 RFI Work Plan for Parcel 22.

5. Section 4.4.2, Soil Investigation, page 4-13

Permittee Statement: "PIKA personnel conducted additional sampling of the post-demolition fill under the concrete pad in building 551. A detailed report, including demolition history and sampling methodology and results, was compiled by PIKA and is included in Appendix M."

NMED Comment 5: The Permittee has submitted a full report as an appendix. This report has not been submitted to NMED for review and, apparently, the work was not performed under an NMED-approved work plan. Inclusion of this report as an appendix is not appropriate. If the Permittee wishes to rely on the data from this report for decision making, the report must be formally submitted to NMED as a stand-alone document for review. In addition, Appendix M contains Appendices A, B, C, and D (See Comment 1). Also, Appendix A of Appendix M contains Chain of Custody forms that contain no signatures, rendering them invalid. Remove this report from the Report appendices and submit it as a stand-alone document with corrections to the other noted issues.

Permittee Response: Concur. Rather than collecting additional samples or submitting the stand-alone report, the Army proposes removing soil from underneath the former Building 551 slab where the two arsenic exceedances occur. This remedial action will be recommended in the Phase 1 and Phase 2 RFI Report and will be addressed in a Corrective Action Plan.

6. Section 4.4.2, Soil Investigation, page 4-13

Permittee Statement: "In addition to fixed laboratory-based analysis of soil samples, a supplemental soil analysis for lead was conducted in the field by USACE with the use of portable x-ray fluorescence (XRF) equipment (see Figure 4-9). A total of 9 XRF readings for soils were recorded (2227B527-1XRF-SO, 2227B527-2XRF-SO, 2227B528-1XRF to 4XRF-SO, and 2227B529-1XRF to 1 3XRF-SO). These samples were analyzed for lead."

NMED Comment 6: The Permittee has generated unreliable data using XRF field instruments on other sites at FWDA. Unless the Permittee can provide a precise correlation between the XRF field instrument and analytical laboratory results, XRF data is considered invalid and must not be presented in the Report. Unsupported field measurements from any field instrument that cannot be verified by analytical laboratory data must not be used for decision making. Provide a precise correlation for the XRF unit including instrument calibration data or remove all references to XRF data from the Report. If data correlation is not possible, propose to conduct discrete sampling at all locations where XRF samples were collected.

Permittee Response: Concur. The Phase 2 RFI Work Plan proposes to collect discrete samples at the nine locations where XRF samples were collected. The following text has been included in Section 4.5 of the Phase 2 RFI Work Plan for Parcel 22: *"To address Comment 6 of the disapproval letter (NMED, 2018) on the 2015 RFI Report (USACE, 2015), the Army will collect nine discrete surface soil samples at the locations of the previous XRF samples (2227B527-SS001-0.0-0.5D-SO and 2227B527-SS002-0.0-0.5D-SO; 2227B528-*

SS001-0.0-0.5D-SO through 2227B528-SS004-0.0-0.5D-SO; and 2227B529-SS001-0.0-0.5D-SO through 2227B529-SS003-0.0-0.5D-SO on Figure 4.4). The samples will be collected with a clean, decontaminated stainless steel spoon from a depth of 0.0 to 0.5 foot bgs and analyzed for lead.”

7. Section 4.4.3.2, Bedrock Monitoring Wells, page 4-15

Permittee Statement: "The bedrock monitoring wells were completed using methods as described in Section 10 of the approved Work Plan (TPMC, 2009)."

NMED Comment 7: This statement is not supported by the Geologic Boring/Well Log records located in Appendix K. Section 10 of the approved Work Plan states that filter and seal materials will be installed using a tremie pipe under pressure. The boring logs indicated these materials were installed using a "slow pour" method. The "slow pour" method significantly increases the potential for bridging of materials in the well, especially in wells exceeding 100-ft of depth, and introduces the potential that the wells are not providing valid representative data. In the revised Report, provide an explanation for why the wells were not installed as described in the NMED-approved Work Plan and a justification for the validity of the data collected from these wells. In addition, provide a complete detailed narrative description of the field methods that were actually utilized in the field for all relevant sections of the revised Report. References to work plans or standard operating procedures is not sufficient.

Permittee Response: Concur. Since the Phase 2 RFI Work Plan does not propose the installation of wells or the collection of groundwater samples, this comment will be addressed in the Phase 1 and 2 RFI Report.

8. Section 4.5.1, Soil Investigation, page 4-17

Permittee Statement: "As summarized in Table 4-8 and shown in Figure 4-8 one SVOC (EPA method 8270C), benzo(a)pyrene was detected at a concentration exceeding the screening criteria in one sample (2227BLD528COMP-SS104D-SO). Benzo(a)pyrene was detected at a concentration of 840 µg/kg, exceeding the screening criteria of 621 µg/kg."

NMED Comment: The benzo(a)pyrene concentration in the sample collected from SB38-00D exceeded the screening criterion (621 µg/kg) and was recorded as 840 µg/kg according to Table 4-8, Method 8270C Semi-Volatile Organic Compounds Soil Investigation Detected Constituents. The same value (840 µg/kg) was recorded in Figure 4-8, Semi-Volatile Organic Carbons Screening Criteria Exceedances; however, the sample designation was SS104D. Correct the discrepancy in the revised Report.

Permittee Response: Concur. The figure discrepancy has been addressed and the following text is included as the second bullet of Section 4.3.1 of the Phase 2 RFI Work Plan for Parcel 22: "The RFI Report indicated that soil sample 2227BLD528COMP-SS104D-SO exceeded the SSL for benzo(a)pyrene at a concentration of 0.84 mg/kg. The residential screening level for benzo(a)pyrene in May 2015 was 0.621 mg/kg. However, the current NMED Human Health Direct Contact SSL for benzo(a)pyrene is 1.12 mg/kg (NMED, 2022);

therefore, there is no exceedance for this sample, and no additional samples are planned at this location.”

9. Section 4.4.2, Soil Investigation, page 9-11, and Section 4.5.1, Soil Investigation, page 4-17

Permittee Statements: "To address NMED HWB Comment 5 in the AM (Appendix A), 50 to 60 sub-samples were to be collected using stratified-random sampling design and biased toward topographic low areas."

"As summarized in Table 4-9 and shown in Figure 4-7, two RCRA metals (EPA method 6010B/7471A), arsenic and lead were detected at concentrations exceeding the screening criteria in one sample (2227MANHOLE1-SD01-00D-SO)."

NMED Comment: Since MI sampling is viewed as a screening tool for the initial stage of site characterization, the reported concentrations of constituents must be multiplied by the number of subsamples for the initial comparison to screening levels. If any exceedances are found during the screening process, the Permittee may be required to conduct additional soil sampling by further dividing each sampling grid where the exceedances are found to determine the location of contamination. Although the Permittee only addresses the exceedances of arsenic and lead concentrations in the discrete soil sample collected from SD01-00D, many metal concentrations exceed the screening criteria in MI samples for SWMU 27. The Report must be revised to address all exceedances in MI samples. In addition, the Permittee must discuss whether additional soil sampling is required through evaluating the background screening values for each metal that exceeds the screening level. Discuss whether these metals are naturally occurring. For example, the aluminum concentration in the MI soil sample collected from SS00IAM was reported as 18,000 mg/kg according to Table 4-9. While multiplying 18,000 mg/kg by 50 (the number of subsamples in SS00IAM), the concentration is calculated as 900,000 mg/kg, exceeding the screening criterion of 78,100 mg/kg. However, the (discrete sample) background screening value for aluminum is reported as 23,340 mg/kg in *Soil Background Study and data Evaluation Report, Version 2* dated October 2010. The reported aluminum concentration (18,000 mg/kg) is comparable to the background screening value (23,340 mg/kg); thus, the exceedance of aluminum concentration (900,000 mg/kg) does not suggest additional sampling is necessary in the decision unit. All metal detections that exceed screening levels must be evaluated for whether the metals concentrations are naturally occurring in the revised Report. Propose to conduct additional soil sampling to define areas of metal contamination in the Phase 2 RFI Work Plan unless the background comparison suggests otherwise.

Permittee Response: Concur. All metal detections that exceed screening levels will be evaluated for whether the metals concentrations are naturally occurring following the process outlined in Section 8.1.5.2 of the Phase 2 RFI Work Plan for Parcel 22. Metals for which sufficient lines of evidence demonstrate they are not site-related or not significantly elevated above the background level will not be evaluated further. Metals without sufficient lines of evidence to demonstrate that they are not site-related will be further sampled to delineate the extent of contamination. Discrete samples are planned for MI sample locations which exceed the SSL following adjustment as directed by NMED. Step-out samples will be collected 10 feet in the four cardinal directions from each discrete sample location that

exceeds the SSL and background. Step-out samples will continue to be collected until the extent of contamination is delineated. The results of the analysis will be documented in the Phase 1 and Phase 2 RFI Report.

10. Section 4.6.2, Soil Characterization, page 4-20

Permittee Statement: "The Army proposes removing and properly disposing the sediment from the manhole [I-3] shown in Figure 4-7 where arsenic and lead exceeded the SSLs, and to collapse and fill the manhole."

NMED Comment: Since the arsenic and lead concentrations exceeded the screening criteria in the sample collected at the manhole I-3, excavate the area as necessary to remove contaminated soils and collect a discrete soil sample from the bottom of the excavation. The soil sample must be analyzed for SVOCs, explosives, VOCs, nitrate, perchlorate, TAL metals, and PCBs prior to backfilling. If the contaminant concentrations exceed the screening criteria, the Permittee must remove additional soil until the detected contaminant concentrations are below the screening criteria. Once the concentrations are below the screening criteria, the excavation and manhole may be backfilled. Include a detailed description of the soil sampling procedure in the Phase 2 RFI Work Plan.

In addition, sampling location (I-3) was selected as a substitute for the upgradient manholes I-1 and I-2; similar contamination may be present along the sewer line. The extent of contamination must be characterized along the sewer line. The MI decision units (SS039AM/BM and SS043AM/BM) define the extent of soil contamination along the sewer line between the manholes I-1 and I-2; however, none of decision units address potential contamination between the manholes I-2 and I-3. Propose to conduct discrete sampling below the sewer line between manholes I-2 and I-3 to investigate potential soil contamination in the Phase 2 RFI Work Plan.

Permittee Response: Concur. The Army is proposing to defer the removal and subsequent sampling of the sediment from manhole I-3 until completion of this RFI. The following text has been added to Section 4.5 of the Phase 2 RFI Work Plan for Parcel 22: "As described in Section 6.2 of the RFI Report (USACE, 2015), the Army proposes preparing corrective measures work plans in a future RCRA phase for the following actions (see Table 1.1): *The Army proposes removing and properly disposing the sediment from the manhole shown as "I-3" in RFI Figure 4-7 (USACE, 2015) where arsenic and lead exceeded the SSLs in sample 2227MANHOLEI1-SD01-00D-SO, and to collapse and fill the manhole. This remedial action will be recommended in Phase 1 and Phase 2 RFI Report and will be addressed in a Corrective Action Plan following completion of the RFI (see Table 1.1).*"

In addition, discrete samples below the sewer line between manholes I-2 and I-3 will be collected to investigate potential soil contamination. The following text has been added to Section 4.5 of the Phase 2 RFI Work Plan for Parcel 22: "*To address Comment 10 of the disapproval letter (NMED, 2018) on the 2015 RFI Report (USACE, 2015), discrete sampling below the sewer line between manholes I-2 and I-3 will be to determine if there is evidence of soil contamination from the sewer line. Two soil borings will be installed equidistant from manholes I-2 and I-3 along the sewer line, as shown on Figure 4.4. Two soil samples will be collected from 4.5-5.0 feet bgs (2227BLDG528SEWER-SB001-4.5-5.0D-SO and*

2227BLDG528SEWER-SB002-4.5-5.0D-SO) and two from 9.5-10.0 feet bgs (2227BLDG528SEWER-SB001-9.5-10.0D-SO and 2227BLDG528SEWER-SB002-9.5-10.0D-SO). The samples will be analyzed for SVOCs, explosives, VOCs, nitrate, perchlorate, TAL metals, and PCBs."

11. Section 4.6.3, Groundwater Characterization, page 4-20

Permittee Statement: "Bis(2-ethylhexyl)phthalate (BEHP) was found in sample results from TMW31S. However, this compound is a common sampling/laboratory contaminant from items made of PVC. It was detected in method blanks associated with other samples. The Army recommends no further action to address BEHP."

NMED Comment: The Permittee's statement is insufficient to justify the presence of the contaminant since groundwater samples collected from other wells (TMW30, TMW32, TMW36 and TMW37) did not contain the contaminant even though the wells were also constructed with PVC. Examine each step of the sampling procedure to verify if any variation exists. Some wells may be equipped with dedicated pumps and others may be sampled by non-dedicated submersible pumps or disposable hailers. Explain the variation in sampling technique and equipment for each well and provide a table that describes the sampling technique and equipment (e.g., pumps, disposable or dedicated tubing).

Permittee Response: Concur. The Northern Area Groundwater Phase 2 RFI Work Plan that was submitted to NMED for review on March 15, 2024, proposes to address the presence of BEHP in well TMW31S. The Northern Area Groundwater Phase 2 RFI Report will evaluate all groundwater data collected to date. The report will include examination of each step of the sampling procedure to verify if any variation exists and explain the variation in sampling technique and equipment for each well and provide a table that describes the sampling technique and equipment (e.g., pumps, disposable or dedicated tubing).

12. Figure 4-7, TAL Metals Screening Criteria Exceedance, and Figure 4-8, Semi-Volatile Organic Carbons Screening Criteria Exceedances, SWMU 27 Building 528 Complex

NMED Comment: The metal concentrations (iron and vanadium) in the samples collected from FAMSO04 and FAMSO05 exceeded the applicable screening criteria during the December 1992 investigation. The extent of contamination associated with FAMSO04 was investigated by the MI decision unit (SS035AM); however, the extent of contamination associated with FAMSO05 was not addressed by any MI decision unit; thus, it is not characterized. The extent of contamination associated with FAMSO05 must be investigated. The same MI sampling procedures must be used as directed by Comment 5 of NMED's 2010 *Approval with Modification* letter; a decision unit (less than quarter acre in size) centering on FAMSO05 with a subsample size of fifty (25 from two to six inches below ground surface (bgs) and 25 from one foot bgs) must be established for the investigation. The samples must be analyzed for explosives, nitrocellulose, nitrate, perchlorate, and TAL metals. Propose to investigate the extent of contamination in the vicinity of FAMSO05 in the Phase 2 RFI Work Plan.

In addition, the SVOC concentrations in the samples collected from FAMSO02, FAMSO03, FAMSO04, and FAMSO05 exceeded the screening criteria during the 1992 investigation.

Discrete soil samples were collected for VOC and SVOC analysis during the 2010 soil investigation; however, these sampling locations (shown in Figure 4-8) appear to be too far from the 1992 sampling locations to aid in defining the extent of the contamination.

Therefore, the extent of SVOC contamination in the vicinity of FAMSO02, FAMSO03, FAMSO04 and FAMSO05 must be further investigated. Utilize the same investigative procedures proposed to define benzo(a)pyrene contamination around SS104D. Propose to collect five additional soil samples to define the extent of contamination; one sample must be collected at 1-1.5 feet bgs below the original location and one sample each at a distance ten feet north, south, east, and west of the original location at a depth of 6 to 9 inches bgs. The samples must be analyzed for VOCs and SVOCs. Propose to investigate the extent of SVOC contamination in the vicinity of FAMSO02, FAMSO03, FAMSO04, and FAMSO05 in the Phase 2 RFI Work Plan.

Permittee Response: Concur. For future investigation activities in Parcel 22, the Army will delineate the extent of contamination using discrete samples. Therefore, the following text has been added to Section 4.5 of the Phase 2 RFI Work Plan for Parcel 22: *“To address Comment 12 of the disapproval letter (NMED, 2018) on the 2015 RFI Report (USACE, 2015) and to define the vertical and lateral extent of PAH contamination at previous sample location FAMSO02, the Army proposes to collect an additional sample at the location of previous sample location from a depth of 1.0 to 1.5 feet bgs (2227BLD528COMP-SB85-1.0-1.5D-SO on Figure 4.4) and step-out samples 10.0 feet in all directions from the original sample location at a depth of 0.5 to 0.75 foot bgs (2227BLD528COMP-SS151-0.5-0.75D-SO through 2227BLD528COMP-SS154-0.5-0.75D-SO on Figure 4.4) to be analyzed for VOCs and SVOCs.*

To address Comment 12 of the disapproval letter (NMED, 2018) on the 2015 RFI Report (USACE, 2015) and to define the vertical and lateral extent of PAH contamination at previous sample location FAMSO03, the Army proposes to collect an additional sample at the location of previous sample location from a depth of 1.0 to 1.5 feet bgs (2227BLD528COMP-SB88-1.0-1.5D-SO on Figure 4.4) and step-out samples 10.0 feet in all directions from the original sample location at a depth of 0.5 to 0.75 foot bgs (2227BLD528COMP-SS155-0.5-0.75D-SO through 2227BLD528COMP-SS158-0.5-0.75D-SO on Figure 4.4) to be analyzed for VOCs and SVOCs.

To address Comment 12 of the disapproval letter (NMED, 2018) on the 2015 RFI Report (USACE, 2015) and to define the vertical and lateral extent of PAH and iron contamination at the previous sample location FAMSO04, the Army proposes to collect an additional sample at the location of previous sample location from a depth of 1.0 to 1.5 feet bgs (2227BLD528COMP-SB87-1.0-1.5D-SO on Figure 4.4) and step-out samples 10.0 feet in all directions from the original sample location at a depth of 0.5 to 0.75 foot bgs (2227BLD528COMP-SS159-0.5-0.75D-SO through 2227BLD528COMP-SS162-0.5-0.75D-SO on Figure 4.4). Samples will be analyzed for VOCs and SVOCs.

To address Comment 12 of the disapproval letter (NMED, 2018) on the 2015 RFI Report (USACE, 2015) and to define the vertical and lateral extent of PAH, iron, and vanadium contamination at the previous sample location FAMSO05, the Army proposes to collect an additional sample at the location of previous sample location from a depth of 1.0 to 1.5 feet bgs (2227BLD528COMP-SB88-1.0-1.5D-SO on Figure 4.4) and step-out samples 10.0 feet

in all directions from the original sample location at a depth of 0.5 to 0.75 foot bgs (2227BLD528COMP-SS163-0.5-0.75D-SO through 2227BLD528COMP-SS166-0.5-0.75D-SO on Figure 4.4). Samples will be analyzed for VOCs, SVOCs, and TAL metals."

13. Figure 4-11, Well and Boring Locations, and Figure 4-12, Groundwater Exceedances

NMED Comment: Both figures have the same page numbers (4-176). Revise the Report to correct the page number on Figure 4-12 and adjust the subsequent page numbers in the Photographs Section.

Permittee Response: Concur. The comment will be addressed in the Phase 1 and Phase 2 RFI Report for Parcel 22.

14. Section 5.4.2, Soil Investigation, page 5-6

Permittee Statement: "The MI sampling process is not applicable to VOCs; therefore, two discrete samples were collected near the former fuel tank from the 6 to 9 inch depth interval using an EnCore, or similar closed vessel samplers (Figure 5-2)."

NMED Comment: Thirty MI decision units were established in SWMU 70 according to Figure 5-3, *Soil Sampling Locations-Multi Incremental SWMU 70*; however, only two discrete samples were collected near the former fuel tank. The Permittee must collect discrete soil samples representing each decision unit. In addition, in Section 5.2.3, *Site Reconnaissance*, the Permittee states, "[t]wo equipment "footprints" were observed at SWMU 70. One footprint, suspected to be that of a tank, was located north of Structure 518 (Photo 5-39). The second footprint was located south of Structure 521 (Photo 5-40)." Collect samples from the two footprint locations. Propose to collect discrete soil samples from each MI decision unit and the two footprint locations to investigate VOC and SVOC contamination in the Phase 2 RFI Work Plan.

Permittee Response: Concur. The following text has been added to Section 5.5 of the Phase 2 RFI Work Plan for Parcel 22: *"To address Comment 14 of the disapproval letter (NMED, 2018) on the 2015 RFI Report (USACE, 2015), additional soil samples will be collected at each of the two equipment footprint locations identified during the 2007 site reconnaissance and analyzed for VOCs and SVOCs. Global Positioning System (GPS) coordinates for the proposed sample locations were obtained using 2009 aerial imagery from the FWDA geographic information system (GIS) database to locate the footprints. Aerial images were compared to Photographs 5-39 and 5-40 of the RFI Report (USACE, 2015) to confirm that the sample locations correlate to the site photographs.*

One sample will be collected from the center of each of the equipment footprints from a depth of 0.5 to 0.75 foot bgs (2270QATST-SB031-0.5-0.75D-SO and 2270QATST-SB036-0.5-0.75D-SO on Figure 5.3). Four additional samples will be collected 10 feet in each direction from the center of each of the footprints, also from a depth of 0.5 to 0.75 foot bgs (2270QATST-SB032-0.5-0.75D-SO through 2270QATST-SB035-0.5-0.75D-SO and 2270QATST-SB037-0.5-0.75D-SO through 2270QATST-SB040-0.5-0.75D-SO on Figure 5.3). The area around the equipment footprints will be inspected for visible evidence of potential contamination including soil staining and distressed vegetation. If visible evidence

is observed, sample locations may be adjusted to those locations.”

15. Section 5.4.2, Soil Investigation, page 5-6, and Section 5.5.1, Soil Investigation, page 5-7

Permittee Statements: "To address NMED HWB Comment 5 in the AM (Appendix A), 50 sub-samples were to be collected using stratified-random sampling design."

"As summarized in Table 5-2 to 5-7 SVOCs (EPA method 8270C), explosives (EPA method 8330B), RCRA metals (EPA method 6010B/7471A), nitrocellulose (by method **WS-WC-0050**) nitrate (EPA method 9056A) and perchlorate (EPA method 6860) were detected at concentrations below the screening criteria."

NMED Comment: The 2,4-dinitrotoluene concentration in the MI soil sample collected from SS016AM was reported as 2.9 mg/kg according to Table 5-4. When multiplying 2.9 mg/kg by 50 (the number of subsamples in SS016AM), the concentration is calculated as 145 mg/kg, exceeding the screening criterion of 15.7 mg/kg. Refer to Comment 5 for the interpretation of MI sampling result. The Permittee must propose to conduct additional soil sampling to further characterize the area of 2,4-dinitrotoluene contamination in the Phase 2 RFI Work Plan. In addition, many metal concentrations exceed the screening criteria in every MI sample in SWMU 70 according to Table 5-3. The Report must be revised to address all exceedances in MI samples. All metal detections having regulatory exceedances must be evaluated in comparison to naturally occurring metals concentrations in the revised Report.

Propose to conduct additional soil sampling to define the areas of potential metals contamination in the Phase 2 RFI Work Plan unless the background evaluation suggests otherwise.

Permittee Response: Concur. The following text has been added to Section 5.5 of the Phase 2 RFI Work Plan for Parcel 22: *“To address Comments 14 and 15 of the disapproval letter (NMED, 2018) on the 2015 RFI Report (USACE, 2015), two discrete soil sample will be collected from each of the 30 SWMU 70 MI sample units and analyzed for VOCs, SVOCs, and TAL metals. One sample will be collected from 0.5 to 0.75 feet bgs (2270QATST-SB001-0.5-0.75D-SO through 2270QATST-SB030-0.5-0.75D-SO on Figure 5.3) at each location and one sample will be collected from 0.9 to 1.1 feet bgs (2270QATST-SB001-0.9-1.1D-SO through 2270QATST-SB030-0.9-1.1D-SO on Figure 5.3) at each location.*

To address Comment 15 of the disapproval letter (NMED, 2018) on the 2015 RFI Report (USACE, 2015), five discrete soil samples will be collected within the RFI MI sample unit of 2270QATST-SS016AM-SO at a depth of 0.5 to 0.75 foot bgs (2270QATST-SB041-0.5-0.75D-SO through 2270QATST-SB045-0.5-0.75D-SO on Figure 5.3) and analyzed for explosives to determine the lateral extent of 2,4-dinitrotoluene.”

The Phase 1 and Phase 2 RFI Report will address all exceedances in MI samples. Discrete samples will be collected from each MI sample location that exceeds screening levels following adjustment as directed by NMED. Discrete samples will be evaluated for whether

the metals concentrations are naturally occurring following the process outlined in Section 8.1.5.2 of the Phase 2 RFI Work Plan for Parcel 22. Metals for which sufficient lines of evidence demonstrate they are not site-related or not significantly elevated above the background level will not be evaluated further. Metals without sufficient lines of evidence to demonstrate that they are not site-related will be recommended for further sampling to delineate the extent of contamination. Step-out samples will be collected 10 feet in the four cardinal directions from each discrete sample location that exceeds the SSL and background. Step-out samples will continue to be collected until the extent of contamination is delineated. The results of the analysis will be documented in the Phase 1 and Phase 2 RFI Report.

16. Section 6.2.3, Site Reconnaissance, page 6-4

Permittee Statements: "Because the igloo doors were secured with non-removable security seals (cable locks), the interiors of the igloos were not observed."

NMED Comment: The response to Comment 24 of the 2009 Disapproval states, "[t]he Army proposes that sampling of the interior of the igloos be done as part of the risk assessment by [Army Center for Health Promotion and Preventive Medicine] USACHPPM and [Agency for Toxic Substances and Disease Registry], ATSDR." Provide a timeline for when the proposed investigation work plan will be submitted to NMED in the revised Report. Ensure that the sampling requirements specified in Comment 24 of the 2009 Disapproval are addressed. Comment 6 in the 2010 AWM states the basis for the requirement of investigation in the igloo interiors; the Permittee must comply with NMED regarding the interiors of the igloos. The Permittee states that the igloo doors were secured with cable locks; thus, the interiors were not observed. However, any cable lock can be unlocked or the cable can be cut to open each igloo and conduct the inspection. The Permittee must propose a work plan to investigate the interiors of the igloos as required by Comment 24 of the 2009 Disapproval.

Permittee Response: Concur. For the interiors of earth-covered magazines (Igloos) in the Northern Area at FWDA (i.e., Parcels 6, 16, 22, and 24), the Army plans to prepare the Igloos for transfer by cleaning the Igloo interiors to a surface wipe occupational health screening criteria derived from Occupational Safety and Health Administration (OSHA) Permissible Exposure Limits (PEL) for an industrial/commercial standard. The Army recently completed a case study on Igloo cleaning procedures and will provide results to NMED immediately as it is available. This is addressed in Section 1.2 and Table 1.1 of the Phase 2 RFI Work Plan for Parcel 22.

17. Section 6.4.1, Igloo Blocks, page 6-7

Permittee Statement: "Additional sampling of drain outlets with lead concentrations exceeding one-half the NMED SSL of 400 mg/kg was conducted under the Sampling and Analysis Plan for Igloo blocks A, C, and D (Appendix N)."

NMED Comment: The Permittee has submitted a work plan as an appendix (See Comment 1). In addition, the Work Plan does not appear to have been approved by NMED prior to

conducting the work. In the revised Report, the Permittee must provide detailed descriptions of the work that was actually conducted. In addition, the Permittee must highlight data that was collected without an NMED-approved work plan in the data tables. Revise the Report accordingly.

Permittee Response: Concur. Additional site characterization and sampling to address comments in the NMED disapproval letter (NMED, 2018) are being addressed in a separate RFI Work Plan for the igloos and revetments at FWDA. The Army submitted the Igloo Exteriors and Revetments RCRA Facility Investigation Sampling Work Plan to NMED on 20 July 2023. Recommended corrective measures will be addressed in a corrective measures work plan as needed following the completion of the RFI. This is addressed in Section 1.2 and Table 1.1 of the Phase 2 RFI Work Plan for Parcel 22.

18. Section 6.5.1, Igloo Blocks, page 6-8

Permittee Statement: "As summarized in Table 6-2, and 6-3 VOCs (EPA method 8260) and DROs (EPA method 8015) were not detected in concentrations exceeding the screening criteria in the composite or Multi-Incremental® soil samples."

NMED Comment: The Permittee stated that the MI sampling was not applicable to VOCs (in Sections 4.4.2 and 5.4.2) in the Report. The Permittee must collect a discrete soil sample for every MI decision unit since DRO and VOCs were detected in the samples in the area. The samples must be analyzed for SVOCs in lieu of DRO. Propose to collect a discrete soil sample for VOC and SVOC analyses from every decision unit in AOC 30 in the Phase 2 RFI Work Plan.

Permittee Response: Concur. Additional site characterization and sampling to address comments in the NMED disapproval letter (NMED, 2018) are being addressed in a separate RFI Work Plan for the igloos and revetments at FWDA. The Army submitted the Igloo Exteriors and Revetments RCRA Facility Investigation Sampling Work Plan to NMED on 20 July 2023. Recommended corrective measures will be addressed in a corrective measures work plan as needed following the completion of the RFI. This is addressed in Section 1.2 and Table 1.1 of the Phase 2 RFI Work Plan for Parcel 22.

19. Section 6.5.1, igloo Blocks, page 6-9

Permittee Statement: "The 2010 XRF analysis found additional SSL exceedances for lead, arsenic, and mercury as shown in Table 6-10 and Figure 6-4. Laboratory confirmation samples were taken on 10 of the in-situ XRF sites where the XRF found lead exceeding 400 mg/kg. Soil was collected at each XRF location and sent to the lab for analysis however the lab results do not correlate well with the XRF results."

NMED Comment: The Permittee states that the XRF data does not correlate with the analytical laboratory results. Unless the Permittee can provide a precise correlation between the XRF field instrument and analytical laboratory results, XRF data is invalid and must not be presented in the Report. Unsupported field measurements from any field instrument that cannot be correlated to analytical laboratory data must not be used for decision making.

Since there is no correlation with analytical laboratory results, remove all references to XRF data from the Report. In addition, propose to resample the locations where XRF was used in the Phase 2 Work Plan.

Permittee Response: Concur. Previous XRF investigations are acknowledged in the Phase 2 RFI Work Plan for Parcel 22; however, XRF results are not used for decision making. Additionally, discrete soil samples are proposed to replace XRF data at SWMU 27. Additional site characterization and sampling to address comments in the NMED disapproval letter (NMED, 2018) are being addressed in a separate RFI Work Plan for the igloos and revetments at FWDA. The Army submitted the Igloo Exteriors and Revetments RCRA Facility Investigation Sampling Work Plan to NMED on 20 July 2023. Recommended corrective measures will be addressed in a corrective measures work plan as needed following the completion of the RFI. This is addressed in Section 1.2 and Table 1.1 of the Phase 2 RFI Work Plan for Parcel 22.

20. Section 6, Figures 6-2 through 6-4

NMED Comment: The scale provided in each of the figures is incorrect. Correct the scales in the revised Report.

Permittee Response: Concur. The Army will ensure the scale on figures in the Phase 2 RFI Work Plan and the Phase 1 and Phase 2 RFI Report are correct.

21. Table Numbers and Titles

NMED Comment: The Report contains many tables that do not include titles. For example, Tables 6-2 through 6-7 contain no titles. The tables in Section 6 following Table 6-8 contain titles, but no table numbers. Ensure that all tables contain table numbers and titles and that all table numbers and titles are repeated for each page of the table. The format for table numbers and titles must be consistent throughout the document. Also, ensure that table titles are accurate in their descriptions. For instance, Table 3-3 is titled *Summary of Detected Constituents in Soil*. This title is misleading, as only metals detections are summarized in Table 3-3. In addition, Table 3-2, *Summary of Detected SVOC Constituents in Soil SWMU- 12*, and Table 3-5, *Parcel 22 SWMU-12: Method 8270 Semi-Volatile Organic Compounds Soil Investigation Detected Constituents*, appear by title to present the same data, but contain different information. While Table 3-2 appears to present historical data, this is not indicated in the table title. Again, ensure that table titles accurately describe the table contents. Revise the Report accordingly.

Permittee Response: Concur. The Army will ensure that table titles in the Phase 2 RFI Work Plan and Phase 1 and Phase 2 RFI Report accurately describe the table contents.

22. Section 6.5.1, Igloo Blocks, page 6-10, and Section 6.6, Conclusions and Recommendations, page 6-10

Permittee Statements: "There were some cases when the XRF sample exceeds the SSL but the related lab sample doesn't and vice-versa. This discrepancy may be due to the XRF sample depth range of a few millimeters compared to a few inches for the lab sample and the inherent variability in soil concentrations from sample to sample."

"The Army proposes preparing corrective measures work plans in a future RCRA phase for the removal of approximately ¼ cubic yard of soil from under the drain outfalls exceeding the SSLs. The Army may also remove the drainpipes from all igloos in the Parcel 22 portion of D-Block and seal up the holes."

NMED Comment: Again, XRF results do not correlate with laboratory results, are therefore invalid, and cannot be used to make decisions. The Permittee must propose to collect discrete samples at all locations where XRF analysis was conducted without laboratory sample confirmation. In lieu of resampling each of these drain outlets, NMED recommends the Permittee propose to remove soils under all drain outfalls where discrete samples were not collected and submitted for laboratory analyses, and then collect discrete confirmation samples from the bottom of each excavation in the Phase 2 RFI Work Plan.

Permittee Response: Concur. Previous XRF investigations are acknowledged in the Phase 2 RFI Work Plan for Parcel 22; however, XRF results are not used for decision making. Additionally, discrete soil samples are proposed to replace XRF data at SWMU 27. Additional site characterization and sampling to address comments in the NMED disapproval letter (NMED, 2018) are being addressed in a separate RFI Work Plan for the igloos and revetments at FWDA. The Army submitted the Igloo Exteriors and Revetments RCRA Facility Investigation Sampling Work Plan to NMED on 20 July 2023. Recommended corrective measures will be addressed in a corrective measures work plan as needed following the completion of the RFI. This is addressed in Section 1.2 and Table 1.1 of the Phase 2 RFI Work Plan for Parcel 22.

23. Section 6.6, Conclusions and Recommendations, page 6-10

Permittee Statement: "No Multi-Increment® sample results from the igloos exceeded the SSLs. The only samples exceeding the SSLs come from the drain outfalls."

NMED Comment: The lead concentration exceeds the screening criterion since the drainpipes were coated with lead-based paint, and lead may be concentrated in the soils around the drain outfalls. The concentrations of arsenic, mercury, and 2,4-dinitrotoluene also exceed the screening criteria; however, it is not clear whether these contaminants come from the drainpipes. Explain whether the extent of arsenic, mercury, and 2,4-dinitrotoluene is limited to the soils around the drain outfalls in the revised Report. In addition, refer to Comment 5 for the interpretation of MI sampling results. The Permittee must reexamine each MI sampling result and revise the Report accordingly. Propose to

conduct additional soil sampling to define the area of contamination in the Phase 2 RFI Work Plan. All metals detections that exceed screening levels must be evaluated for whether the metals are naturally occurring in the revised Report. Propose to conduct additional soil sampling to define the areas of potential metals contamination in the Phase 2 RFI Work Plan unless the background evaluation suggests otherwise.

Permittee Response: Concur. Additional site characterization and sampling to address comments in the NMED disapproval letter (NMED, 2018) are being addressed in a separate RFI Work Plan for the igloos and revetments at FWDA. The Army submitted the Igloo Exteriors and Revetments RCRA Facility Investigation Sampling Work Plan to NMED on 20 July 2023. Recommended corrective measures will be addressed in a corrective measures work plan as needed following the completion of the RFI. This is addressed in Section 1.2 and Table 1.1 of the Phase 2 RFI Work Plan for Parcel 22.

24. Section 6.6, Conclusions and Recommendations, page 6-10

Permittee Statement: "The Army will use both the 2009 exceedances shown on Figure 6-3 and the 2010 XRF exceedances shown on Figure 6-4 as the data of record determining exceedances of the cleanup levels. The 10 XRF confirmation samples will not be used."

NMED Comment: The Permittee has proposed to utilize data that has been shown to be invalid based on comparisons to analytical laboratory data and not rely on data that is valid analytical laboratory data. This is not acceptable. XRF data that shows no correlation to analytical laboratory data is not valid and cannot be used to make decisions. Remove all reference to XRF data from the Report (unless the reference is to state that the data proved to be invalid). Propose to collect discrete samples from each location where XRF analysis was performed without collecting a laboratory confirmation sample and submit the samples for analysis at an analytical laboratory in the Phase 2 Work Plan.

Permittee Response: Concur. Previous XRF investigations are acknowledged in the Phase 2 RFI Work Plan for Parcel 22; however, XRF results are not used for decision making. Additionally, discrete soil samples are proposed to replace XRF data at SWMU 27. Additional site characterization and sampling to address comments in the NMED disapproval letter (NMED, 2018) are being addressed in a separate RFI Work Plan for the igloos and revetments at FWDA. The Army submitted the Igloo Exteriors and Revetments RCRA Facility Investigation Sampling Work Plan to NMED on 20 July 2023. Recommended corrective measures will be addressed in a corrective measures work plan as needed following completion of the RFI. This is addressed in Section 1.2 and Table 1.1 of the Phase 2 RFI Work Plan for Parcel 22.

25. Section 7.5, Evaluation of Current Investigation, page 7-5

Permittee Statement: "No soil samples collected in AOC 69 had detectable concentrations of PCBs (EPA method 8082) or Asbestos (EPA method 600)."

NMED Comment: Photos 7-6 and 7-7 exhibit potential asbestos containing materials on the ground. Even though the sample analysis indicated no detectable concentration of asbestos

in AOC 69, the photo evidence suggests that the corrective measures must be implemented. A thorough visual inspection for the presence of friable asbestos containing materials in the vicinity of all buildings in AOC 69 must be conducted. The Permittee must address the visual indication of asbestos and propose removal in the Phase 2 RFI Work Plan.

Permittee Response: Concur. An asbestos survey was completed on August 7, 2019, for Building 316 by an accredited asbestos building inspector with an unexpired license and submitted to NMED for review on February 20, 2020, in the *Final Asbestos Survey Report, Parcel 22, Fort Wingate Depot Activity, Gallup, New Mexico* (USACE, 2020). This survey addresses NMED Comment 29 of the disapproval letter (NMED, 2018) on the 2015 RFI Report (USACE, 2015). Field teams will be briefed on the findings of the ACM survey prior to initiating fieldwork.

26. Section 7, Figure 7-4, Diesel Range Organics Screening Criteria Exceedances, and Table 7-4, method 8015M Diesel Range Organics Soil Investigation Detected Constituents

NMED Comment: The screening criterion of Diesel Range Organics (DRO) is indicated as 620 mg/kg in Figure 7-4 while it is indicated as 520 µg/kg in Table 7-4. In Section 7.5, *Evaluation of Current Investigation (2009-2010)*, the screening criterion is reported as 520 mg/kg. The 2017 NMED *Risk Assessment Guidance* shows that the screening level of diesel #2 crankcase oil is 1,000 mg/kg. The Permittee must use a consistent value for the DRO screening criterion. In addition, both Table 7-4 and Figure 7-4 show the DRO concentrations in a unit of micrograms per kilogram (µg/kg). Ensure that the units are accurate. This issue must be corrected in the revised Report.

Permittee Response: Concur. The Army will ensure that units and screening levels are accurate throughout the Phase 2 RFI Work Plan and Phase 1 and Phase 2 RFI Report for Parcel 22 for all analytes, including DRO.

27. Section 7.6.2, AOC 69 Conclusions and recommendations, page 7-7

Permittee Statement: "An arsenic value of 4.1 mg/kg was the only constituent exceeding the cleanup levels at Building 302. Based on the discussion in section 2.5 and 7.6.1, and the fact that arsenic is the only exceedance at Building 302, the Army proposes no further action at the building."

NMED Comment: Comment 3 of the 2009 Disapproval states, "[t]he Permittee must remove the coal ash or remnants of the coal ash and collect a representative number of discrete soil samples from depths of 6 to 12 inches bgs [at south of Building 302]." The Permittee's response in Appendix A states, "[t]he Army proposes doing so in the corrective measures implementation phase where multiple response actions can be performed under a single contract." The Permittee must address the removal of coal ash and propose to collect soil samples from the limits of the excavations in the Phase 2 RFI Work Plan.

Permittee Response: Concur. The Army is proposing to defer the removal and subsequent sampling of the coal ash pile pending completion of the RFI for Parcel 22. The following text

has been added to Section 6.5 of the Phase 2 RFI Work Plan for Parcel 22: *“During the 2007 site reconnaissance, a coal ash pile was observed south of Building 302. To address Comment 27 of the disapproval letter (NMED, 2018) on the 2015 RFI Report (USACE, 2015), the coal ash pile will be recommended for removal and disposal at an appropriate disposal facility. Following the removal of the coal ash pile, five discrete confirmation soil samples will be collected from 0.5 to 1.0 foot bgs and analyzed for SVOCs and TAL metals. Removal of the coal ash will be recommended in the Phase 1 and Phase 2 RFI Report and will be addressed in a Corrective Action Plan (see Table 1.1).”*

28. Section 7.6.2, AOC 69 Conclusions and Recommendations, page 7-7

Permittee Statement: "The removal area will extend to midway between the sample point exceeding the SSL and the adjacent 'clean' sample point."

NMED Comment: Although soil removal is proposed from midway between the sampling locations SS013/SS014 and sampling location SS020, there is no 'clean' sample point east of and adjacent to SS020 along the rail track. The Permittee must collect a soil sample approximately 25 feet east of SS020 along the rail track. If the contaminant concentrations exceed the screening criteria, extend soil sampling along the rail track to define the extent of contamination. The sampling procedures and analytical parameters must be consistent with other rail track samples. Propose to collect soil sample(s) at a location 25 feet east (and further as necessary) of SS020 in the Phase 2 RFI Work Plan.

Permittee Response: Concur. The following text has been added to Section 6.5 of the Phase 2 RFI Work Plan for Parcel 22: *“To address Comment 28 of the disapproval letter (NMED, 2018) on the 2015 RFI Report (USACE, 2015), one soil sample (2269TRACKS-SS055D-SO on Figure 6.3) will be collected 10.0 feet east of previous sample 2269TRACKS-SS020D-SO to define the eastern extent of contaminants adjacent to tracks south of Building 301. The sample will be collected with a clean, decontaminated stainless steel spoon from a depth of 0.0 to 0.25 foot bgs and analyzed for VOCs, SVOCs, explosives, DRO, PCBs, and TAL metals.”*

29. Section 7.6.2, AOC 69 Conclusions and Recommendations

NMED Comment: The conclusions and recommendations regarding Building 316 are not included in the Report. Six samples (SS049D through SS054D) were collected around Building 316 and analyzed for asbestos, explosives, and lead. Asbestos and explosives were not detected and the lead concentrations were detected below the screening level according to Table 7-5, *Method 6010B/7471A Metals Soil Investigation Detected Constituents*. Since the roofing material of Building 316 was found on the ground near the building, the Permittee must test the material for the presence of asbestos. The material must be collected for asbestos analysis. In addition, the Permittee must visually inspect the presence of any suspected asbestos containing materials in the vicinity of Building 316. Propose to conduct the investigation in the Phase 2 RFI Work Plan.

Permittee Response: Concur. The conclusions and recommendations regarding Building 316 will be included in the Phase 1 and Phase 2 RFI Report for Parcel 22. Additionally, the following text is included in Section 6.5 of the Phase 2 RFI Work Plan for Parcel 22: *“To*

address NMED Comment 29 of the disapproval letter (NMED, 2018) on the 2015 RFI Report (USACE, 2015), an asbestos survey was completed on August 7, 2019, for Building 316 by an accredited asbestos building inspector with an unexpired license (USACE, 2020). The asphaltic roofing material was located within a 100-foot radius around the building. This material was similar to materials sampled previously in the 1990s that were verified to contain greater than 1% asbestos; therefore, no additional samples were taken during the 2019 inspection. The area containing asbestos related to Building 316 was 0.7 acres." Field teams will be briefed on the findings of the ACM survey prior to initiating fieldwork.

30. Section 9.1.1, Location, Description, and Operational History, page 9-1

Permittee Statement: "For simplicity, the former X-sites will be called AOC 88A (the eastern location and AOC 88B (the western location), and the ACM debris area will be called AOC 88C."

NMED Comment: The figures of AOC 88 (Figure 9-1, *Soil sampling Locations-Multi Incremental and Discrete*, and Figure 9-2, *Geophysical Survey*) show the locations of AOC 88A and 88B; however, the location of AOC 88C is not shown. Include the location of AOC 88C in the associated figures in the revised Report.

Permittee Response: Concur. All figures showing AOC 88 in the Phase 1 and Phase 2 RFI Report will include AOC 88C.

31. Section 9.2.2, Historical Records Review, page 9-3, and Section 9.3, Evaluation of Data from previous Investigations, page 9-3

Permittee Statements: "Asbestos was not detected in five confirmatory soil samples following removal."

"Samples were not collected to evaluate this AOC."

NMED Comment: The latter statement should be revised to note that five confirmatory soil samples were collected. Revise the statement in the revised Report.

Permittee Response: Concur. The statement will be revised as requested in the Phase 1 and Phase 2 RFI Report for Parcel 22.

32. Section 9.2.3, Site Reconnaissance, page 9-3

Permittee Statement: "A single piece of suspect ACM was observed near the south end of the arroyo channel (Photo 9-6) in [AOC 88C]."

NMED Comment: Asbestos containing materials were removed from AOC 88C in 2001 and the subsequent confirmatory sampling did not detect asbestos in the soil. However, a piece of suspect asbestos containing material was observed during this phase of the investigation. Since the area occupying AOC 88C is small and manageable for more thorough visual inspection, the Permittee must re-inspect for the presence of friable asbestos containing materials in AOC 88C. Propose to conduct the inspection in the Phase 2 RFI Work Plan.

Permittee Response: Concur. An asbestos survey was completed on August 7, 2019, for Building 316 by an accredited asbestos building inspector with an unexpired license and submitted to NMED for review on February 20, 2020 in the *Final Asbestos Survey Report, Parcel 22, Fort Wingate Depot Activity, Gallup, New Mexico* (USACE, 2020). This survey addresses NMED Comment 29 of the disapproval letter (NMED, 2018) on the 2015 RFI Report (USACE, 2015). Field teams will be briefed on the findings of the ACM survey prior to initiating fieldwork.

33. Geophysical Investigation

NMED Comment: Digital geophysical mapping (DGM) identified subsurface anomalies during the site reconnaissance in SWMUs 12, 27, 70, and AOC 88. The areas where subsurface anomalies were identified during the reconnaissance appear to be too large to excavate to inspect each anomaly. Provide an explanation of how subsurface anomalies identified by DGM will be inspected in the Phase 2 RFI Work Plan.

Permittee Response: Concur. The following text has been added in Sections 3.2.7.5, 4.2.6.2, and 5.2.5.2 of the Phase 2 RFI Work Plan for Parcel 22 as it pertains to SWMUs 12, 27, and 70, respectively: *“If removal actions are deemed necessary following the Phase 2 RFI, the results of the geophysical investigation will be considered during planning.”* The Army will submit a separate work plan to address the MEC components of Parcel 22 under separate cover.

If you have questions or require further information, please contact me at Cheryl.a.frischkorn.civ@army.mil, 505-629-7951 (home office) or 703-624-6429 (work phone, preferred) or George.h.cushman.civ@army.mil 703-455-3234 (Temporary Home Office, preferred) or 703-608-2245 (Mobile).

Sincerely,



Cheryl Frischkorn
BRAC Environmental Coordinator
Fort Wingate Depot Activity
BRAC Operations Branch
Environmental Division

Enclosures

CF:

Neelam Dhawan, NMED, HWB
Ben Wear, NMED, HWB
Michiya Suzuki, NMED, HWB
Dale Thrush, U.S. EPA Region 6
Laurie King, U.S. EPA Region 6
Douglas Hickman, SW BIA
Wenona Wilson, BIA

Sharlene Begay-Platero, Navajo Nation
Timothy Trimble, Zuni Tribe
Ian Thomas, BRAC Ops
George Cushman, BRAC Ops
Alan Soicher, USACE
Ben Moayyad, USACE
Admin Record, NM / Ohio