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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

August 15, 2019

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: RESPONSE TO APRIL 16, 2019 APPROVAL WITH MODIFICATIONS LETTER
FINAL REVISION 1 GROUNDWATER PERIODIC MONITORING REPORT
JULY THROUGH DECEMBER 2017,
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-18-003**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *Final Revision 1 Groundwater Periodic Monitoring Report, July through December 2017, Response to April 16, 2019 (Response)*, dated June 24, 2019. NMED has reviewed the Response. The Permittee must address the following comments.

1. Permittee's Response to NMED's Approval with Modifications Comment 3

Permittee Statement: "The sampling parameters required for Well 69 will be collected in April 2019 and the results will be incorporated in the January-June 2019 Groundwater Periodic Monitoring Report (GPMR)."

NMED Comment: The Permittee's letter titled *Well #69 Groundwater Samples Collected in*

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May 2017 Analytical Results, dated July 11, 2019, states, “[t]he groundwater sample collected from Well 69 in May 2017 was not performed under an approved work plan, thus the data is not usable for decision-making purposes.” Although the analytical data collected on May 2017 is not usable for decision-making purposes, it is useful to understand general groundwater conditions in Well 69 since no other historical data is available for Well 69. Include the May 2017 data for Well 69 in the January-June 2019 Groundwater Periodic Monitoring Report (Report) in addition to the data collected during the April 2019 event.

2. Permittee’s Response to NMED’s Approval with Modifications Comment 8

Permittee Statements: “The Army would also like NMED to note that the Army intends to complete a baseline groundwater risk assessment prior to taking any corrective action based on the screening assessment of groundwater. This baseline assessment will be part of the northern groundwater RFI and will incorporate site-specific groundwater characteristics and realistic exposure refinements, so that the risk from groundwater use will reflect the reasonably anticipated future use of groundwater at FWDA. In order to accomplish this, TPH analytical data will need to be generated that are consistent with the US EPA RSLs, which are comprised of 3 aliphatic fractions (low, medium and high) and 3 aromatic fractions (low, medium and high).”

and,

“The Army will be contacting NMED in correspondence separate from this letter to propose implementing these modifications to the analyses list for the RFI and the on-going groundwater monitoring program to address this future evaluation.”

NMED Comment: Conducting a risk assessment at this time is not appropriate, nor is it a wise use of the Army’s reportedly limited funding. The outcome of a risk assessment conducted at this time will provide no relief to the Permittee regarding the requirement to cleanup groundwater to the regulatory standards including the TPH cleanup levels included in NMED’s Risk Assessment Guidance. In addition, any changes to the groundwater monitoring program must be proposed in the annual update of the Facility-Wide Groundwater Monitoring Plan. The proposed changes must be approved by NMED prior to any implementation of the changes.

3. Requirement for the 1,4-Dioxane Analysis

NMED Comment: Chlorinated solvents have been detected in some groundwater samples collected at the Facility. The Permittee must analyze groundwater samples collected from all monitoring wells where chlorinated solvents have been detected within the past ten years for 1,4-dioxane using EPA Method 8270 Selective Ion Monitoring (SIM). Propose to

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analyze for 1,4-dioxane for two consecutive events in the upcoming revision of the Interim Facility-Wide Groundwater Monitoring Plan.

The Permittee must address all comments in this letter in the January-June 2019 Groundwater Periodic Monitoring Report and the annual update of the Interim Facility-Wide Groundwater Monitoring Plan.

Should you have any questions, please contact Michiya Suzuki of my staff at (505) 476-6059.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
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