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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

April 16, 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: APPROVAL WITH MODIFICATIONS
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* (Report), dated February 2019. NMED has reviewed the Report and hereby issues this Approval with Modifications. The Permittee must address the following comments.

1. Permittee's Response to NMED's Disapproval Comment 2 Item 1

Permittee Statement: "The explosives plume contour line has been adjusted to represent the data presented."

NMED Comment: Well TMW04 is now depicted inside the contour line; however, the contour line was revised from 7 ug/L to 9.7 ug/L. The RDX screening level was also changed from 7 ug/L to 9.7 ug/L in Table 5.3. Provide an explanation for the revised RDX screening level in a response letter. Since the RDX concentration in the groundwater sample

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collected from well TMW04 is recorded as 9.1 ug/L, well TMW04 should be depicted outside the 9.7 ug/L-contour line. Correct the figure to accurately present of the plume and provide a replacement figure.

2. Permittee's Response to NMED's Disapproval Comment 4

Permittee Statement: "The Army respectfully proposes not to include EDB analysis in the future IFGMP for monitoring wells."

NMED Comment: Since EDB analysis using EPA Method 8011 was conducted in October 2015 and none of the groundwater samples contained detectable EDB concentrations, NMED concurs with the Permittee's proposal not to include EDB analysis in the future IFGMP. No response is required.

3. Permittee's Response to NMED's Disapproval Comment 6

Permittee Statement: "Army will add Well 69 to next round of sampling once the new contract award is completed."

NMED Comment: Comment 38 in the NMED's *Disapproval Final Parcel 3 Groundwater RCRA Facility Investigation Report* (Report), dated October 17, 2018, directed the Permittee to provide the analytical results for Well 69 as part of the response to Comment 6 in the response letter for the September 4, 2018 *Disapproval*. Accordingly, provide the analytical results.

4. Permittee's Response to NMED's Disapproval Comment 7

Permittee Statement: "The Army is currently contracting an investigation by visual inspection (lowering a video camera) and to be followed up with abandonment of Well 69. The Video report including results of that investigation will be provided to NMED. Please note that any new contract actions take time to award as the USACE is required to follow the contract rules and regulations."

NMED Comment: Due to the on-going issues related to the course of action for Well 69, the investigation may potentially be further delayed. Comment 7 states, "[p]ropose to measure the [depth-to-water] DTW in Well 69." If the DTW data was previously collected for Well 69, provide the data in the response letter.

5. Permittee's Response to NMED's Disapproval Comment 9

Permittee Statement: "Revised calculations were made using wells TMW39D to TMW19, TMW32 to TMW18, and TMW39D to TMW16. The average gradient calculated is 0.006 ft/ft."

NMED Comment: The clarification provided for the bedrock hydraulic gradient must also be provided for the alluvial hydraulic gradient. Section 4.1.1, *Northern Area Alluvial Groundwater System*, lines 12-13, page 4-2, states that hydraulic gradients ranged from 0.002 foot/foot (ft/ft) to 0.03 ft/ft in the alluvial groundwater unit. However, the reference points used to calculate the gradients were not stated. Provide a map showing the reference points and replacement pages for a revised Section 4.1.1.

6. Permittee's Response to NMED's Disapproval Comment 10

Permittee Statement: "The Army will collect groundwater and analyze for explosives at TMW13 during the October 2018 monitoring event; however, if the well is non-detect, the Army proposes not to add explosives to the TMW13 analytical suite in the next IFGMP."

NMED Comment: The Permittee must complete minimum of two rounds of explosives analysis. The results must be evaluated to determine if there are detections of explosive compounds that warrant the inclusion of explosive compound analysis in the IFGMP updates. In the applicable groundwater monitoring reports, discuss the results of the analysis for the groundwater samples collected from well TMW13.

7. Permittee's Response to NMED's Disapproval Comment 12

Permittee Statement: "The Army has proposed to install an additional bedrock well east of existing well TMW39D in a separate work plan, as agreed in verbal communication between the Army and NMED on October 3, 2018. Army has then submitted a Letter Work Plan on October 24, 2018 for NMED review and approval."

NMED Comment: Although NMED issued a disapproval for the *Letter Work Plan Downgradient Alluvial Aquifer Investigation & Installation of One Additional Well* on February 5, 2019, the disapproval was primarily related to the investigation and the installation of proposed alluvial wells. NMED did not have issues with the proposed installation of bedrock well east of well TMW39D and the proposed location of bedrock well depicted on Figure 4 of the Letter Work Plan appears appropriate.

8. Permittee's Response to NMED's Disapproval Comment 13

NMED Comment: The NMED does not agree with the proposed approach. The Permittee has a long history of adhering to the guidance provided in NMED's *Risk Assessment Guidance for Site Investigations and Remediation* (RAG). While the FWDA RCRA Permit does specify the screening level hierarchy, the Permit was written over thirteen years ago. The hierarchy was appropriate at that time, but risk assessment methods have evolved significantly since then, and the more recent methods include new screening levels for contaminants that are regularly updated and published in the RAG. The Permittee has benefitted from the changes to the RAG over the years, as well as other accommodations that

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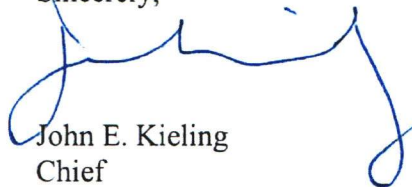
the NMED has allowed, such as the ability to compare arsenic concentrations to a range of background values. The comment simply directs the Permittee to compare TPH-D concentrations to the screening level provided in the RAG. Should the Permittee refuse to comply, the Report will not be approved; therefore, the data presented in the report will not be acceptable for decision-making purposes. A strict adherence to the Permit would result in revocation of the 2013 arsenic letter, among other ramifications that the Permittee has likely not considered. The Permittee must revise the Report to include the TPH-D screening level and comparison of detected TPH-D concentrations in the risk assessment.

The Permittee must address all comments in this Approval with Modifications and submit a response letter with a revised figure and replacement pages as well as an electronic redline-strikeout version of the revised Report showing all changes that have been made to the Report no later than **June 28, 2019**.

This approval is based on the information presented in the document as it relates to the objectives of the work identified by NMED at the time of review. Approval of this document does not constitute agreement with all information or every statement presented in the document.

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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File: FWDA 2019 and Reading, Groundwater, FWDA-18-003