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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 17, 2007

Mark Patterson
BRAC Environmental Director
Ravenna Army Ammunition Plant
Building 1037
8451 State Route 5
Ravenna, OH 44266

**RE: NOTICE OF DISAPPROVAL
INTERIM FACILITY WIDE GROUNDWATER
MONITORING PLAN VERSION 1
FORT WINGATE DEPOT ACTIVITY, EPA ID # NM6213820974
FWDA-07-002**

Dear Mr. Patterson:

The New Mexico Environment Department (NMED) has completed its review of the U.S. Department of the Army's (the Permittee) *Interim Facility-Wide Ground Water Monitoring Plan Version 1* (Interim Plan), dated October 3, 2007. This submittal is a requirement of Section V.A of the *Fort Wingate Depot Activity RCRA Permit* (RCRA Permit) and is in response to NMED's Notice of Disapproval (NOD), dated July 6, 2007. The Permittee must address all comments contained in this NOD and submit a revised Interim Plan. The deficiencies of the Interim Plan are outlined below.

Comment 1

The Permittee states in Section 2.1 (General Description), page 2-1, paragraph 3 that "[a]s shown in Figure 2, the installation is almost entirely surrounded by federally owned or administered lands, including both national forest and Tribal lands. The installation can be divided into

several areas based upon location and historical land use. These major land-use areas include (Figure 2):..." "Protection and Buffer Areas" were not identified and labeled on Figure 2.

The Permittee must revise Figure 2 to label and identify the "Protection and Buffer Areas."

Comment 2

The Permittee states in Section 4.2 (Ground Water Sampling), page 4-1, paragraphs 1 and 2 that "[t]he Army proposes to install dedicated low flow sampling pumps (QED Environmental Sample Pro pumps or equivalent) in each well to be sampled, and will attempt to perform sampling at all wells using low flow techniques. Detailed low flow sampling procedures are provided in Section 5.2. There are a number of wells in the northern portion of FWDA that have historically been dry; if a minimum of 3 feet of water (a low flow pump is approximately 2 feet long) is detected in any of these wells during a groundwater elevation survey event, an attempt to sample the well as described in Section 5.2 will be made during the next scheduled sampling event."

Low flow sampling may not be appropriate for all wells at Fort Wingate. For wells with limited yield (i.e., wells for which low flow sampling cannot be accomplished), water in the borehole must be evacuated and the recharge sampled as soon as practicable using traditional well purging methods, such as a centrifugal pump or bailer. Traditional groundwater sampling procedures and well purging methods must be discussed in the Interim Plan. The January 19, 2007 *Interim Facility-Wide Groundwater Monitoring Plan Draft* included a section on "Traditional Groundwater Sampling Procedures." It is not clear why this section was removed from the Interim Plan.

Comment 3

The Permittee states in Section 4.2.1 (OB/OD Unit Ground Water Sampling), page 4-1, paragraph 1 that "[s]amples will be collected from 22 existing ground water monitoring wells as shown in Figure 4 and Table 2."

Table 1 in the "OB/OD Area" section of the Interim Plan contains monitoring well FW24 and FW31, which are not identified in Table 2. The Permittee must revise Table 2 to include sampling of monitoring wells FW24 and FW31. If these wells are usually dry, they must be included in Table 2 and labeled as dry in the groundwater monitoring reports and in the table of the Interim Plan. The Permittee must also revise the sentence in Section 4.2.1 to state that samples will be collected from 24 rather than 22 of the existing ground water monitoring wells.

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Comment 4

The Permittee states in Section 4.2.2 (Northern FWDA Ground Water Sampling), page 4-1, paragraph 1 that “[s]amples will be collected from 40 existing groundwater monitoring wells, as shown in Figure 5 and Table 3.”

Table 3 (Ground Water Sample Matrix Northern FWDA) contains 53 wells, three of which will not be sampled. Table 3 indicates that ten of the 40 wells are “[t]ypically dry,” and that chemical analyses will not be conducted on water samples collected from nine of those ten wells, if water is present.

The Permittee must revise Table 3 to identify the analyses to be performed on samples collected from monitoring wells (FW07, FW08, FW11, FW12, FW13, FW26, FW27, FW28, and FW29) if sufficient water is present. If these wells are dry during the groundwater sampling events, this must be indicated in the annual groundwater monitoring report. However, if sufficient water is present, the wells must be sampled. The Permittee must revise Section 4.2.2 to state that all wells containing sufficient water will be sampled.

Comment 5

The Permittee states in response to Comment 5 of the July 6, 2007 NOD in Appendix B “[t]he goal of the maps provided in this Interim Plan is to guide field personnel to well locations for the purpose of collecting groundwater samples.” The Permittee must revise the Figures 3-4 as described below:

- a. It is difficult to distinguish individual features on Figure 3. The wells found in Parcels 7, 11, and 21 are clustered together, making it difficult to identify the individual well locations and road systems within the installation. All well locations must be removed from Figure 3, allowing the reader to view the installation, parcel numbers, road systems and other features.
- b. Figures 4 and 5 must be revised to include monitoring wells FW24 and FW31, respectively. An additional Figure may be added to depict the location of well FW31.

Comment 6

The Permittee’s response to Comment 6 in the July 6, 2007 NOD states, “[t]he forms provided in Appendix A-1 were simply the most recent field forms for each well proposed for sampling, to be used by field personnel as a reference for what to expect when sampling. Because additional wells have been proposed for sampling to address Comment 12, the most recent forms for the additional wells have been added to Appendix A-1.”

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The Permittee must clarify if the response to Comment 6 meant to reference Appendix C-1; there is no Appendix A-1 in the revised Interim Plan.

Comment 7

The Permittee's response to Comment 13j of Appendix B states "[t]o address Comment 13j (and as noted in the response to Comment 12e), target compound lists have been added as Appendix H to the Interim Plan." The Permittee's response to Comment 12e of Appendix B states "[t]o address Comment 12e, target compound lists have been added as Appendix G to the Interim Plan."

The Permittee must clarify which appendix should be referenced in the response to Comment 12e and 13j because neither of these appendices include the target compound lists.

The revised Interim Plan must include a response letter that details where all revisions have been made cross-referencing NMED's numbered comments. The revised Interim Plan must be submitted to NMED no later than January 31, 2008.

If you have questions regarding this letter please contact Tammy Diaz of my staff at 505-476-6056.

Sincerely,



James P. Bearzi
Bureau Chief
Hazardous Waste Bureau

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HWB-FW-07-002

