NEW MEXICO
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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 16, 2009

Mark Patterson
Ravenna Army Ammunition Plan
Building 1037
8451 State Route 5
Ravenna, OH 44266

Steve Smith
CESWF-PER-DD
819 Taylor Street, Room 3A12
PO Box 17300
Fort Worth, TX 76102-0300

RE: APPROVAL WITH DIRECTION
INTERIM FACILITY-WIDE GROUND WATER MONITORING REPORT FOR JANUARY, APRIL, JULY 2008
FORT WINGATE DEPOT ACTIVITY, EPA ID # NM6213820974
FWDA-09-001

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) has completed its review of the U.S. Department of the Army's (the Permittee) *Facility-Wide Ground Water Monitoring Report for January, April, July 2008*, (Report) dated December, 2008. This submittal is a requirement of Section V.A.2 of the *Fort Wingate Depot Activity RCRA Permit* (RCRA Permit). NMED hereby approves this Report with the following direction.

COMMENT 1

In Section 5.1 (Northern Area Sampling Activities and Results), page 5-1, of the Report, the Permittee states that Environmental Protection Agency (EPA) Method 8015A was used for the analysis of Total Petroleum Hydrocarbons (TPH), gasoline range organics (GRO), and diesel range organics (DRO). In the *Interim Facility-Wide Ground Water Monitoring Plan (Version 2)* (Work Plan), dated March 28, 2008, in Table 4 (Environmental and Quality Control Samples Summary Matrix), the Permittee states that EPA Method 8015B will be used for the analysis of

TPH, GRO, and DRO. Contrary to what is presented in the Report and the Work Plan, the laboratory results provided in Appendix B (from the CD) of the report show that Method 8015B was used for the analysis of TPH, GRO, and DRO. In addition to the above discrepancies, Appendix B (Appendix B1 – Quality Control Summary Report Fort Wingate Army Depot Groundwater Monitoring Program) of the Report, includes a list of analytical methods (Section 3, page 2 of 16), and the listed analytical method for GRO and DRO is EPA method 8015D.

According to EPA's SW846 the most current analytical method for TPH, DRO, and GRO is 8015C, 8330B for explosives, 8260C for volatile organic compounds, 8081B for pesticides, 8280 B and 8290A for dioxins and furans, 7470A for mercury, and 6010C/6020A for total and dissolved metals (http://www.epa.gov/epawaste/hazard/testmethods/sw846/online/8_series.htm). For future monitoring reports, the Permittee must ensure that the most current analytical methods are being used and that the methods being reported are consistent with what is used by the laboratory. If the Permittee uses a method different to that reported in the Work Plan, the Permittee must specify this in the Report(s). No revision to the Report is necessary.

COMMENT 2

In Section 5.0, page 5-1, the Permittee states that Appendix B contains tables of all analytical laboratory results. However, in Appendix B of the Report, the Permittee provides Appendix B2 (QA/QC Results Relative Percent Difference), and Appendix B3 (Total Metals Result Table), and states that Appendix B4, B5, B6, and B7 are contained on the CD. The CD contains files with titles not specific to the laboratory results and/or constituents. Based on the titles of the appendices listed on the CD, it is unclear which appendix contains results for metals, VOCs, SVOCs, etc... making it difficult to locate the laboratory results for specific constituents.

In future reports, the Permittee must ensure that the titles of the appendices listed in the text of report are consistent with the actual appendices titles (e.g., Appendix B (on the CD) is titled APPLreports, therefore in the text the Permittee must state that TPH, DRO, and GRO, laboratory results are found in the file titled APPLreports, located in Appendix B, provided on the CD). In addition, if the laboratory results are included in the appendices or on a CD the Permittee must ensure that the specific location is clear in the text of the report. No revision to the Report is necessary.

COMMENT 3

The Permittee provides summary Tables in Section 5 (Tables 5-1 through 5-11) that includes the concentrations of constituents detected in groundwater samples collected during the monitoring event. In future reports, the summary tables must include current data as well as data from the three previous monitoring events. If there are fewer than three events, the Permittee must state this in the report and include all the data available. No revision to the Report is necessary.

COMMENT 4

In the summary tables provided in the Report (Tables 5-1 through 5-11), the Permittee does not include a definition for MSSL-CA, MSSL-NC, J, B, or E. The Permittee must define these notations in the summary tables to be included in all future groundwater monitoring reports. No revision to the Report is necessary.

COMMENT 5

In Section 7.1 (Analytical List Reduction), page 7-1, the Permittee proposes that the analytical list required for groundwater samples be reduced for the next sampling event. The Permittee must characterize the nature, rate, and extent of all releases of hazardous waste and/or hazardous constituents in groundwater, and in order to achieve this, the Permittee must continue to collect samples, as stated in the Work Plan, for three consecutive sampling events. Therefore, the Permittee must continue to conduct the groundwater sampling included in the Work Plan (Table 2) as part of the groundwater analysis, for three consecutive sampling events (through Spring 2009).

The results for each sampling event must be included in each interim monitoring report submitted to NMED. Following the three sampling events, if specific constituents are not detected in the groundwater samples analyzed, the Permittee may propose to revise the sample matrix for future groundwater sampling events. Once these sampling changes have been approved, the Permittee may update the Work Plan to include the proposed changes. No revision to the Report is necessary.

COMMENT 6

In Section 7.2 (Well Abandonment), page 7-1, the Permittee requests that numerous wells be abandoned. The Permittee must include all of the wells (excluding CMW16 and CMW06) in the April 2009 sampling event. If the Permittee is still unable to collect groundwater elevations or samples from these wells, the Permittee may propose to abandon the wells in the April 2009 periodic monitoring report.

Since CMW16 and CMW06 were not located, the Permittee may exclude them from future sampling events. The Permittee must revise the Work Plan to incorporate the removal of the CMW16 and CMW06 wells. Re-submittal of the entire Work Plan is not necessary instead the Permittee may submit a revised Table 2, and include a letter that states it is a revision to the Work Plan. The table must be titled to state that it is a modification to the previous Table 2 as well as include the revision date. No revision to the Report is Necessary.

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

Sincerely,

John E. Kieling
Program Manager
Permits Management Program
Hazardous Waste Bureau

cc:

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