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Secretary

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 15, 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 OCTOBER 2008 TO JANUARY 2009
FORT WINGATE DEPOT ACTIVITY, EPA ID # NM6213820974
FWDA-09-005**

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 October 2008 to January 2009*, (Report) dated June, 2009. 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 the summary tables provided in the Report (Tables 5-1 through 5-11), the Permittee does not include definitions for the acronyms CA, NC, J, B, or E. The Permittee must define these notations in the footnotes of the summary tables to be included in all future groundwater monitoring report submittals. No revision to the Report is necessary.

COMMENT 2

In the summary tables provided in the Report (Tables 5-1 through 5-9), the Permittee must remove the "CASNR" column and replace it with the sampling date (m/d/yy). The Permittee must also remove the "V Flag" and "Final Flag" columns and only include the laboratory flag. No revisions to the Report are necessary; however, the Permittee must ensure that future groundwater monitoring reports include these changes.

COMMENT 3

In the summary tables provided in the Report (Tables 5-10 through 5-14) the Permittee must remove the "CASNR" column and replace it with the sampling date (m/d/yy). Rather than including columns for the "Flag" results the Permittee must include the "Laboratory Flag" results in the corresponding "Results" cell (e.g., Cesium 0.5 J). In addition the Permittee must revise the table formats according to the attached Table 1. No revision is necessary however future groundwater report submittals must incorporate these changes.

COMMENT 4

In Tables 5-1 through 5-9 the Permittee presents groundwater results for the October 2008 sampling event. In Tables 5-10 through 5-14 the Permittee presents the April 2008 and the October 2008 sample results for comparison. However, not all of the wells from the October 2008 sampling event (Tables 5-1 through 5-9) are included in the comparison tables (Tables 5-10 through 5-14). For example, Table 5-4, (perchlorate results) lists 18 wells where perchlorate is detected, Table 5-13 (April-October 2008: Perchlorate Detected) only includes nine of those 18 wells. No revisions are necessary; however, the Permittee must ensure that this discrepancy is addressed in all future groundwater report submittals.

COMMENT 5

In Section 7.0, the Permittee recommends that the "analytical list required for groundwater samples be reduced". In email correspondence between NMED and David Henry of the USACE on September 16, 2009 and September 23, 2009, NMED responded to this request and expanded the number of analysis proposed by the Permittee for the next sampling event. The Permittee must ensure that the table sent via email by NMED (Table 102009), which includes NMED's modifications, is included in the next revision of the interim groundwater monitoring plan submittal.

According to Section V.A.4 of the RCRA Permit, the Annual Revision to the interim plan must be sent to NMED within ninety calendar days after each anniversary of the effective date of the Permit. Therefore, the revised Interim Plan must be submitted to NMED by March 31, 2010.

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COMMENT 6

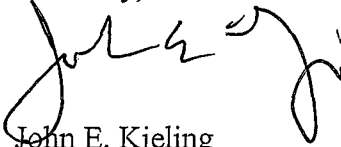
In Section 7.3 (Well Installation), the Permittee states that TMW05 and FW10 contain high concentrations of perchlorate and, if abandoned, should be replaced. NMED concurs that if these wells are abandoned they must be replaced. The Permittee must submit a work plan to NMED for approval prior to abandonment and/or installation of new wells.

COMMENT 7

The Permittee includes "Photographs" in Appendix A, "Pump Specifications and Records" in Appendix C, "NMED Low Flow Guidance Document" in Appendix D, "Instrument Manuals" in Appendix H, and "Groundwater Regulatory Human Health Standards" in Appendix I. The inclusion of these appendices in every report submittal is not necessary, unless there are changes such as changes to the pumps being used. The Permittee must remove these appendices from future groundwater report submittals. Future reports must only include information related to the specific sampling event (e.g., wells sampled, maps, figures, sampling procedures, methods, results, conclusions, waste disposal, and any deviations from the work plan). No revisions to the current report are 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:

Dave Cobrain NMED HWB
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Charles Hendrickson, U.S. EPA Region 6
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File: FWDA 2009 & Reading File
HWB-FWDA-09-005

