



DEPARTMENT OF THE ARMY
OFFICE OF THE DEPUTY CHIEF OF STAFF, G-9
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

October 4, 2022

Base Realignment and Closure Operations Branch

Mr. Rick Shean
Chief, Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

RE: Response to Approval with Modifications, Final Groundwater Periodic Monitoring Report, July through December 2020 Revision 2, Fort Wingate Depot Activity, McKinley County, New Mexico. EPA# NM6213820974, HWB-FWDA-22-003

Dear Mr. Shean:

This letter provides responses to the comments issued in the Approval with Modifications, Final Groundwater Periodic Monitoring Report, July through December 2020 Revision 2, Fort Wingate Depot Activity, McKinley County, New Mexico, EPA ID# NM6213820974, HWB-FWDA-22-003, dated July 25, 2022. In addition to the comment responses provided in this letter, replacement pages for the two (2) previously submitted hard copies and two (2) electronic (CD) copies of the Final Groundwater Periodic Monitoring Report, July through December 2020, Revision 3, including a redline strikeout version, are enclosed for your review and consideration.

Comments:

1. Permittee's Response to NMED's Approval with Modifications Comment 2, dated April 5, 2022

Permittee Statement: "It appears that January 2019 reading is an anomaly, most likely due to human error in recording the water level."

NMED Comment: The Permittee's response to Comment 18 of the NMED's July 1, 2020 *Disapproval* states, "[t]he groundwater elevations were all verified through multiple measurements during the field monitoring events and confirmed to accurately record the depth to water." The Permittee's two statements are contradictory. Furthermore, Comment 8 of the NMED's March 8, 2021 *Disapproval* states, "[t]he Permittee asserts that the measurements are correct. If so, well BGMW08 may be damaged or poorly constructed and a conduit for contaminant migration." NMED is concerned that groundwater retained in well BGMW08 may be leaking from the well casing. Submit a work plan to investigate the integrity of well BGMW08 no later than **December 31, 2022**.

Permittee Response: Concur: The Army will submit a brief workplan for a downhole camera survey to assess the integrity of well BGMW08. As required, the workplan will be submitted no later than December 31, 2022.

No change to the document as a result of this comment.

2. Permittee's Response to NMED's Approval with Modifications Comment 3, dated April 5, 2022

Permittee Statement: "ORP and Eh both quantify the potential to transfer electrons; however, Eh is defined as a voltage reading relative to the Standard Hydrogen Electrode (SHE), while ORP may be relative to any reference electrode based upon the construction of the field measuring device."

NMED Comment: The intent of the statement is not clear. NMED's *Approval with Modifications* Comment 3 requires the Permittee to discuss the purpose of converting ORP to Eh. Clearly explain (a) why it is necessary to convert ORP readings to Eh and (b) whether ORP readings reported by one field instrument would be different from the readings reported by others in a response letter. Provide a response and replacement pages.

Permittee Response: Concur: The following sentence was added to the end of the last paragraph in Section 5.1, page 5-2, lines 2-3: "The purpose of converting ORP to Eh is to standardize the data, since ORP readings could be different for different reference electrodes."

3. Permittee's Response to NMED's Approval with Modifications Comment 4, dated April 5, 2022

Permittee Statement: "This report and future reports will reflect all non-detects to be <LOD. All figures and tables were revised accordingly."

NMED Comment: Although the October 2020 analytical data were correctly revised to report non-detects as <LOD, the Report contains three additional data sets previously collected (i.e., April 2020, April and October 2019 data) and the non-detects were still reported as <DL for them. Although it is not necessary to correct the tables in this Report, the Permittee must provide accurate tables in all future reports, including the data listed for the previous three events. For this Report, the Permittee can either correct the tables or provide clarification by adding a footnote to each table that states that the non-detects are reported as <DL instead of <LOD. Provide replacement tables.

Permittee Response: Concur: While each analytical table already contains a footnote defining "<" as "less than cited Detection Limit; less than Limit of Detection for October 2020 and newer data", the respective footnote for each table was revised to read as follows: "< = less than DL for data from April 2020, April and October 2019 data; less than LOD for October 2020 data."

If you have questions or require further information, please contact me at George.h.cushman.civ@army.mil, 703-455-3234 (Temporary Home Office, preferred) or 703-608-2245 (Mobile).

Sincerely,

George H. Cushman IV

George H. Cushman IV
BRAC Environmental Coordinator
Fort Wingate Depot Activity
BRAC Operations Branch
Environmental Division

Enclosures

CF:

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