



MICHELLE LUJAN GRISHAM  
GOVERNOR

JAMES C. KENNEY  
CABINET SECRETARY

**Certified Mail - Return Receipt Requested**

March 11, 2024

George H. Cushman  
Headquarters, Department of the Army  
Office of the DCS, G-9  
Army Environmental Office, Room 5C140  
600 Army Pentagon  
Washington, DC 20310-0600

**RE: APPROVAL WITH MODIFICATIONS  
GROUNDWATER PERIODIC MONITORING REPORT  
JANUARY THROUGH JUNE 2022 REVISION 1  
FORT WINGATE DEPOT ACTIVITY  
MCKINLEY COUNTY, NEW MEXICO  
EPA ID# NM6213820974  
HWB-FWDA-23-003**

Dear Mr. Cushman,

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *Groundwater Periodic Monitoring Report January through June 2022 Revision 1* (Report), dated December 2023. NMED has reviewed the Report, and hereby issues this Approval with Modifications with the following comments.

**COMMENTS**

**1. Permittee's Response to NMED's Disapproval Comment 8, dated October 19, 2023**

**Permittee Statement:** "The Army considers that various reasons for the apparent contradictory readings are possible including introduction of air into the water discharge line; this can increase the instantaneous DO reading, while the ORP measurement is less susceptible to instantaneous changes since it measures a cumulative potential."

**NMED Comment:** The Permittee's April 19, 2021 letter states, "[d]ownhole probes/sondes are available to measure DO and many other in situ water quality parameters. In situ measurement is a much more effective alternative to displacing air from multiple wells." Although the use of in-situ probes may or may not resolve this recurring issue due to

SCIENCE | INNOVATION | COLLABORATION | COMPLIANCE

Hazardous Waste Bureau - 2905 Rodeo Park Drive East, Building 1, Santa Fe, New Mexico 87505-6313  
Telephone (505) 476-6000 - [www.env.nm.gov](http://www.env.nm.gov)

agitation/aeration of groundwater while purging a well, NMED agrees that the Permittee could propose to use downhole probes for water quality measurements, where applicable, in the next groundwater monitoring plan update. Refer to Comment 2 of the NMED's October 26, 2021 *Approval with Modifications Final Groundwater Periodic Monitoring Report, July through December 2019 Revision 1* for details. In the response letter, propose to use downhole probes for water quality measurements, where applicable, in the next groundwater monitoring plan update.

## 2. Permittee's Response to NMED's Disapproval Comment 10, dated October 19, 2023

**Permittee Statement:** "Section 5.2.1 was significantly revised to discuss the findings of each anion."

**NMED Comment:** Although an electronic redline strikeout (RLSO) version of the Report (i.e., Apr 2022 PMR rev 01\_Text RLSO) was provided in the compact disc (CD), some revisions made to the original March 2023 Report were not presented in the RLSO version of the Report (e.g., Section 5.2.1). The Permittee must provide an electronic RLSO version that presents all of the revisions made to the original reports in all future submittals, as required by NMED. Although resubmission of the RLSO version of the Report is not required, acknowledge this provision in the response letter.

## 3. Permittee's Response to NMED's Disapproval Comment 16, dated October 19, 2023

**Permittee Statement:** "Appendix G in the July to December 2020 PMR shows the well [BGMW08] is still recharging (water elevation increasing) in the six months between sampling events."

**NMED Comment:** The statement indicates that the groundwater elevations reported for well BGMW08 have not reached equilibrium. It is necessary to evaluate the equilibrated groundwater elevation in well BGMW08. In the response letter, propose to investigate the equilibrated groundwater elevation in well BGMW08; continue gauging groundwater elevations in well BGMW08, and halting purging/sampling until the investigation is complete. In addition, include this provision in the next groundwater monitoring plan update.

The Permittee must address all comments in this Approval with Modifications and submit a response letter no later than **May 31, 2024**.

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.

Mr. Cushman  
March 11, 2024  
Page 3

Should you have any questions, please contact Michiya Suzuki of my staff at (505) 690-6930.  
Sincerely,

**Ricardo Maestas**

Digitally signed by Ricardo  
Maestas  
Date: 2024.03.11 08:53:46 -06'00'

Ricardo Maestas  
Acting Chief  
Hazardous Waste Bureau

cc: N. Dhawan, NMED HWB  
B. Wear, NMED HWB  
M. Suzuki, NMED HWB  
L. McKinney, EPA Region 6 (6LCRRC)  
L. Rodgers, Navajo Nation  
S. Begay-Platero, Navajo Nation  
K. Noble, Pueblo of Zuni  
V. Neha, Southwest Region BIA  
G. Padilla, Navajo BIA  
J. Wilson, BIA  
B. Howerton, BIA  
R. White, BIA  
C. Esler, Sundance Consulting, Inc.  
A. Soicher, USACE

File: FWDA 2024 and Reading

