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**Certified Mail - Return Receipt Requested**

March 19, 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: DISAPPROVAL  
2024 INTERIM NORTHERN AREA GROUNDWATER MONITORING PLAN  
FORT WINGATE DEPOT ACTIVITY  
MCKINLEY COUNTY, NEW MEXICO  
EPA ID# NM6213820974  
HWB-FWDA-24-001**

Dear Mr. Cushman,

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *2024 Interim Northern Area Groundwater Monitoring Plan (Plan)*, dated January 2024. NMED has reviewed the Plan, and hereby issues this Disapproval with the following comments.

**GENERAL COMMENTS**

**1. Withdraw of the 2023 Plan**

**NMED Comment:** NMED received the Permittee's *Response to Disapproval, 2023 Interim Northern Area Groundwater Monitoring Plan (Response)*, dated August 31, 2022. Subsequently, the Permittee submitted the *Withdraw Request for Final 2023 Interim Northern Area Groundwater Monitoring Plan, Revision 1 (Withdraw Request)* on November 10, 2023; then, NMED approved the Withdraw Request on November 27, 2023. Since the Withdraw Request was submitted and approved, the Response was no longer subject to NMED's review and all of the comments contained in the July 19, 2022 *Disapproval 2023 Interim Northern Area Groundwater Monitoring Plan (Disapproval)* were redirected to the *2024 Interim Northern Area Groundwater Monitoring Plan (2024 Plan)*, where applicable. During the review of the 2024 Plan, NMED found that the comments contained in the July

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19, 2022 Disapproval did not appear to be clearly addressed. In order to verify whether or not the comments were addressed in the 2024 Plan, submit a response letter that identifies the sections, tables, and/or figures of the 2024 Plan where each comment contained in the July 19, 2022 Disapproval was addressed. If some of the comments are no longer relevant to the 2024 Plan or have already been addressed previously, explain why they are no longer relevant to the 2024 Plan or how they were previously addressed in the response letter.

## 2. Objectives of the Plan

**NMED Comment:** Permit Section V.A.4 states, “[t]he Permittee shall revise and update the Interim Plan annually to propose changes to the monitoring plan (e.g., to include monitoring wells installed pursuant to Sections VI and VII; to remove wells not providing valid data; to evaluate new off-site wells that have the potential to be impacted; to make any other appropriate changes).” Since the objective of the Interim Groundwater Monitoring Plan generally pertains to the changes to the groundwater monitoring plan for an upcoming year, it is critical for NMED to review, provide comments, as necessary, and approve such changes, as appropriate, in a timely manner so that the Permittee can implement updated groundwater monitoring activities with NMED approval prior to the initial groundwater monitoring/sampling event (i.e., April) and the rest of the year. However, the Plan contains a) 74 pages of text with unnecessary details, 14 pages of figures, 95 pages of tables, and appendices A, B, and C. While NMED agrees that some information contained in the Plan is essential to support its purpose, the Plan should be more simplified and narrowly focus on its purpose to receive a timely approval from NMED. For example, the Plan includes a lengthy discussion of previous investigations (i.e., Section 2.2 and the subsections). It is unclear why and how such discussion is pertinent to the Plan; the discussion regarding previous investigations must be reduced in the future, as appropriate. The structure of all future plans must be modified to focus on its purpose. Also, refer to Comments 1 and 3 of July 19, 2022 Disapproval. Although no revision is required to the Plan, acknowledge this provision in the response letter.

### SPECIFIC COMMENTS

#### 3. Section 2.2, Previous Investigations, lines 10-11, page 25

**Permittee Statement:** “Results from previous investigations are briefly discussed for each report in the following subsections.”

**NMED Comment:** Subsections of Section 2.2 (i.e., Sections 2.2.1 through 2.2.24) provide a summary of previous investigations. NMED did not verify accuracy of the description contained in Sections 2.2.1 through 2.2.24. The purpose of the Plan, as described in the Permit Section V.A.4 and Section 1.3 of the Plan, does not pertain to the details of previous



investigations; therefore, NMED is neither required to verify the accuracy nor provide comments regarding the description of previous investigations. Approval of the Plan does not constitute agreement with the description contained in Sections 2.2.1 through 2.2.24. Although no Revision is required to the Plan, address this comment in the future plans.

**4. Section 2.3, Semiannual RCRA Groundwater Monitoring Reports and Updated Groundwater Monitoring Plans – Ongoing, lines 26-28, page 30**

**Permittee Statement:** The Interim Facility-wide GWMP is updated annually and the Northern Area GWMP is submitted as a stand-alone document per NMED request dated October 22, 2018 (NMED, 2018a)."

**NMED Comment:** An annual update of the Interim Facility-wide Groundwater Monitoring Plan is also required by the Permit Section V.A.4. Correct the statement for accuracy or provide a clarification in the revised Plan.

**5. Section 3.4.3, Hydrogeology, lines 4-5, page 35**

**Permittee Statement:** "Currently, Well 69 (screened in the San Andres-Glorieta aquifer) produces groundwater continuously; and it may be used for non-potable purposes occasionally."

**NMED Comment:** The Permittee submitted the January 2024 *Field Summary Report Abandon and Plug Artesian Wells #68 and #69*, which describes the abandonment activities at Wells 68 and 69. Section 3.4.4, *Northern Area Alluvial Groundwater System* also states that Well 69 was abandoned in 2023. The statement does not appear to describe the current status of Well 69. Revise the statement for accuracy, as appropriate.

**6. Section 3.4.5, Northern Area Bedrock Groundwater System, lines 1-3, page 37**

**Permittee Statement:** "A third water-bearing sandstone unit is assumed since groundwater from well BGMW08 was measured at 100-feet lower than those of other bedrock wells."

**NMED Comment:** The Permittee's December 22, 2023 *Final Groundwater Periodic Monitoring Report, January through June 2022* (Report) states, "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." The statement indicates that the groundwater elevation reported for well BGMW08 has 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 halt purging/sampling until the investigation is complete. Include this provision in the revised Plan.

**7. Section 3.4.5, Northern Area Bedrock Groundwater System, lines 6-9, page 37**

**Permittee Statement:** "A comprehensive survey was performed in October 2019 for all the Northern Area groundwater network monitoring wells by DePauli Engineering and Surveying LLC using the New Mexico State Plane West, Zone Grid North American Datum of 1983 (NAD 83). In general, most wells measured 0.7- to 1.1-foot higher with the new survey without changing any flow patterns."

**NMED Comment:** According to Table 3-1, *Northern Area Water-level Measurements by Groundwater Zone*, the updated well TOC elevations for applicable wells are recorded in July 2019. It appears that the survey was performed before October 2019. Correct the statement for accuracy in the revised Plan, as appropriate.

**8. Section 3.5, Nature and Extent of Groundwater Contamination, lines 12-20, page 37**

**Permittee Statement:** "Nitrate, perchlorate, explosives, one VOC, and metals are consistently detected in groundwater samples at concentrations above the screening levels. Thirteen groundwater contaminant plumes have been identified: two nitrate plumes, one in the alluvial aquifer and one in the bedrock aquifer; one explosives plume in the alluvial aquifer; two perchlorate plumes, one in the alluvial aquifer and one in the bedrock aquifer; one VOC plume for 1,2-DCA in the alluvial aquifer; two TPH-DRO plumes, one in the alluvial aquifer and one in the bedrock aquifer; one TPH-GRO plume in the alluvial aquifer; two chloride plumes, one in the alluvial aquifer and one in the bedrock aquifer; and two sulfate plumes, one in the alluvial aquifer and one in the bedrock aquifer (Eco, 2023)."

**NMED Comment:** The first sentence states that nitrate, perchlorate, explosives, one volatile organic compound (VOC), and metals are consistently detected; however, the latter sentences state that nitrate, explosives, perchlorate, one VOC, TPH-DRO, TPH-GRO, chloride and sulfate plumes are identified. The analytes mentioned in these two statements are not consistent and need clarification or correction. Resolve the discrepancy in the revised Plan.

**9. Section 3.5, Nature and Extent of Groundwater Contamination, lines 20-23, page 37**

**Permittee Statement:** "While metals are consistently detected in groundwater samples at concentrations above the screening levels, background groundwater concentrations have not been accepted for FWDA and it cannot be demonstrated whether the detected concentrations are a result of natural conditions or anthropogenic sources."

**NMED Comment:** Background groundwater concentrations for anions and metals have not been established at the site; thus, it is unknown if the detected concentrations resulted from background or anthropogenic sources (refer also to Comment 5 of the July 19, 2022 Disapproval). Anions (i.e., chloride and sulfate) are identified as plumes in the Plan, but metals are not. If the exceedances of the anion concentrations are identified as plumes, the



exceedances of the metal concentrations must also be identified as plumes for consistency. Revise the Plan accordingly.

**10. Section 3.5, Nature and Extent of Groundwater Contamination, lines 25-31, page 37**

**Permittee Statement:** “Figure 3-1 and Figure 3-2 present the alluvial and bedrock groundwater elevations generated from the April 2022 water-level measurement event. Plume boundaries defined by iso-concentration contours at the contaminant screening-level concentration were generated from the April 2022 monitoring event. Northern Area alluvial contaminant plumes for select contaminant concentrations that can be contoured are provided in Figures 3-3 through 3-10; and Figures 3-11 through 3-13 cover the Northern Area bedrock groundwater contaminant plumes. Analytical results corresponding to the contaminant plumes are presented in Appendix B.”

**NMED Comment:** The changes to the monitoring plan must be evaluated based on the data collected from the most recent monitoring event that is available to the Permittee at the time the Plan is prepared. The Plan pertains to the forthcoming monitoring events; therefore, it is essential to evaluate the most recent data to propose any changes to the monitoring plan. No revision is required to the Plan.

**11. Section 3.5, Nature and Extent of Groundwater Contamination, lines 3-5, page 38**

**Permittee Statement:** “The explosives plume in bedrock appears to have the same potential source areas as nitrate and metals, which originate near the TNT Leaching Beds (SWMU 1) and Building 528 Complex (SWMU 27) (Figure 3-11).”

**NMED Comment:** According to Figure 3-11, *Groundwater Monitoring Bedrock Wells – Nitrate, Explosives, Metals*, the nitrate plume is depicted south (i.e., upgradient) of the TNT Leaching Beds; however, the explosive plume is not depicted. NMED is not aware of the presence of the explosives plume in the bedrock aquifer. Verify the accuracy of the statement and correct the statement in the revised Plan, as appropriate. Also revise Figure 3-11 to depict the explosive plume in the revised Plan, as appropriate.

**12. Section 4.1, Scope of Activities, lines 5-6 and 11-13, page 41, and Section 4.3, Groundwater Sampling, lines 15-18, page 42**

**Permittee Statements:** “The different types of sampling and purging methods described in this section are identified in Table 4-1.” and, “Low-flow purging and sampling is the preferred sampling method at FWDA. In addition, borehole purging is proposed at wells with poor recovery as is consistent with previously approved monitoring plans.” and, “Monitoring well sampling at FWDA involves a variety of purging and sampling methods, as shown in Table 4-1. Wells are sampled either with dedicated low-flow pumps (i.e., BESST and Zone Isolation Sampling Technology [ZIST]), high-volume dedicated pumps (Bennett),

portable submersible pump, or hand bail.”

**NMED Comment:** According to Table 4-1, *Northern Area Groundwater Purge Method*, traditional low flow, submersible pump, hand bail, ZIST low flow, Bennett pump, and reclamation pump have been proposed to purge wells. However, the purging/sampling methods described in the text and Table 4-1 are not consistent. Resolve the discrepancy or provide a clarification in the revised Plan. In addition, it is unclear how and why wells were purged with the various purging/sampling methods listed in Table 4-1. Determine the suitability for the low-flow method for each well and provide a justification for those wells where purging/sampling was conducted by other methods in the revised Plan. Furthermore, Comment 12 of the July 19, 2022 Disapproval, which pertains to low-flow method, was not addressed in the 2024 Plan. Although the comment was addressed in the Response, the Response is no longer subject to NMED’s review (see Comment 1 above). Therefore, the July 19, 2022 Disapproval Comment 12 must be addressed in the revised 2024 Plan.

### 13. Section 4.1, Scope of Activities, line 14, page 41

**Permittee Statement:** “Groundwater samples will be analyzed for one or more of the following COPCs.”

**NMED Comment:** Per- and polyfluoroalkyl substances (PFAS) were not included as a Contaminants of Potential Concern (COPCs) in Section 4.1. Although Comment 1 of NMED’s August 3, 2021 *Final 2022 Interim Northern Area Groundwater Monitoring Plan Revision 2, Army’s Responses to the Approval with Modifications dated March 8, 2021* states, “[p]ropose to conduct PFAS analysis for the groundwater samples collected from the pertinent wells in the next groundwater monitoring plan update,” the comment was not addressed or acknowledged in the 2023 Plan. Comment 2j of the July 19 2022 Disapproval also reminded the Permittee of the provision of PFAS sampling. However, this provision was not addressed or acknowledged in the 2024 Plan. Include PFAS as part of the list of COPCs and propose to collect groundwater samples for PFAS analysis in the revised Plan. Potential PFAS releases to the environment must be investigated under the February 2015 Fort Wingate Depot Activity Resource Conservation and Recovery Act Permit (Permit). PFAS are emerging contaminants of concern that meet the statutory definition for hazardous waste defined in New Mexico Hazardous Waste Act Section 74-4-3.K, Section 1004(5) of the Solid Waste Disposal Act, and Section 6903(5) of the United States Resource Conservation and Recovery Act and are defined as such in the Permit as required by 40 Code of Federal Regulations 270.32(b)(2) for protection of human health and the environment. Failure to follow NMED direction constitutes noncompliance and may result in an enforcement action.

### 14. Section 4.3.2, Low-Flow Pump Purging, line 30, page 43, and lines 1-2, page 44



**Permittee Statement:** “Dedicated pumps are constructed of Delrin™ (acetal homopolymer) plastic, or stainless steel, and the tubing is Teflon™-lined polyethylene. Tubing fittings that contact the sample stream are stainless steel.”

**NMED Comment:** Some materials used for pumps and tubing are not compatible with PFAS sampling (e.g., Teflon™). Ensure that all materials that contact the sample stream are compatible with PFAS and propose to replace all incompatible pumps and tubing for the wells where PFAS sampling is proposed in the revised Plan, as applicable.

**15. Section 4.3.2, Low-Flow Pump Purging, line 30, page 43, and lines 1-2, page 44**

**Permittee Statement:** “The ZIST packer system have (sic) not proven to be consistently effective in the long-term, and to not consistently provide an appropriate seal. The Army proposes removal of the ZIST system from TMW14A and TMW17, and sampling in accordance with Section 4.3.4 (see on following page).”

**NMED Comment:** Section 4.3.4, *Alternative Groundwater Purging and Sampling Procedures* discusses alternative methods (i.e., hand bailing with disposable bailers, a submersible pump, or a dedicated piston pump) of purging and sampling due to extremely low-yield/low-water levels. According to the drawdown data included in the November 2023 *Groundwater Periodic Monitoring Report July through December 2022* (Report), the water level drawdown of wells TMW14A and TMW17 are recorded as 2.49 feet and 0.06 feet, respectively. The drawdown for well TMW14A is greater than 0.3 feet, which indicates that the recharge rate at well TMW14A may be too slow for the use of low-flow purging and sampling; therefore, another method may be applicable. According to the November 2023 Report, the pumping rate for TMW14A is recorded as 150 mL/min. Propose to reduce the pumping rate from 150 mL/min to 100 mL/min and evaluate whether drawdown can be reduced in the revised Plan. If the drawdown still exceeds 0.3 feet after reducing the pumping rate, the use of another purging/sampling method for TMW14A would be appropriate. On the contrary, the water level drawdown for well TMW17 appears to be appropriate (i.e., less than 0.3 feet); therefore, the groundwater samples collected from well TMW17 continue to be representative of the formation water. Continue to conduct purging/sampling at well TMW17 using the ZIST system. Furthermore, propose to conduct biennial inspection for the integrity of the ZIST system in the revised Plan.

**16. Section 4.3.2.1, Traditional Low-Flow and ZIST Low-Flow Dedicated Pumps, Traditional Low-Flow, lines 32-34, page 45**

**Permittee Statement:** “Once water quality readings are stabilized (Step 9), the established water-level drawdown must not be more than 4 inches/0.33 foot from stabilization until the end of sample collection.”

**NMED Comment:** Table 4-1, *Northern Area Groundwater Purge Method*, identifies wells where traditional low-flow purge method has been used. According to the drawdown data included in the November 2023 Report, the water level drawdown exceeds 0.33 feet in wells where traditional low-flow purge method is utilized (e.g., SMW01 and TMW24). Propose to reduce the pumping rate, where applicable, and to evaluate whether the water level drawdown can be reduced less than to the criteria (4 inches/0.33 feet) in the revised Plan. If the drawdown still exceeds the criteria after reducing the pumping rate, the low-flow method would not be considered appropriate. In this case, propose to change the purging/sampling method for the wells in the future plans.

**17. Section 4.3.2.1, Traditional Low-Flow and ZIST Low-Flow Dedicated Pumps, Traditional Low-Flow, lines 35-37, page 45**

**Permittee Statement:** "If stabilization of water quality readings is not reached within 1 hour, and at least eight water-quality readings have been collected, samples will be collected from the well at this time."

**NMED Comment:** This sampling criterion is not described in the NMED's October 2001 *Position Paper Use of Low-Flow and Other Non-Traditional Sampling Techniques for RCRA Compliant Groundwater Monitoring*, and the Permittee did not provide a reference for this condition. Provide a reference or justify the acceptability of the groundwater samples where stabilization is not achieved in the revised Plan.

**18. Section 4.3.3, Groundwater Sample Collection by Low-Flow Pump, lines 10-12, page 46**

**Permittee Statement:** "Continue to monitor DTW to assure that the water level does not decrease more than 0.33 foot (4-inches) from the established pumping level during sampling (not for ZIST-equipped wells)."

**NMED Comment:** The ZIST system is a modified low-flow purge method. It is not clear why the water level drawdown criterion of 0.33 foot does not apply to the ZIST system. Provide an explanation in the response letter.

**19. Section 4.3.4, Alternative Groundwater Purging and Sampling Procedures, lines 5-8, page 47**

**Permittee Statement:** "Prior to purging, an additional DO measurement with a downhole probe will be collected on all wells without a dedicated pump. DO is the only parameter that shows a potential affect from pumping the water through a flow-through cell by possible introduction of air into the system."

**NMED Comment:** It is unclear why a dedicated pump cannot be pulled out from wells and a downhole probe is used to measure dissolved oxygen (DO) concentrations. Explain why a



dedicated pump cannot be pulled out or propose to use a downhole probe for DO measurements for all wells, where applicable, in the revised Plan.

**20. Section 4.4.3, Sample Shipping, lines 18-20, page 51**

**Permittee Statement:** "Samples will be transported to Eurofins Environment Testing (Eurofins) located at 4955 Yarrow Street in Arvada, Colorado for analytical testing. If requested by USACE, a second laboratory (chosen by USACE) will be used to analyze triplicate samples."

**NMED Comment:** Comment 2a of the NMED's July 19 2022 Disapproval required the Permittee to propose to split the nitrite samples collected from wells MW27, MW35, and TMW59 and use two different analytical laboratories to conduct nitrite analysis. If this provision has not previously been addressed, include the provision in the revised Plan.

**21. Section 4.5, Decontamination, lines 1-2, page 52**

**Permittee Statement:** "Scrub the surfaces of the equipment using distilled water and a non-phosphate detergent-cleaning solution and reusable-dedicated decontamination brushes."

**NMED Comment:** Some cleaning solutions (e.g., Alconox®) are ideal for decontamination. In order to verify if an appropriate cleaning solution was selected, provide the product name of the cleaning solution and MSDS (if the cleaning solution is not Alconox®) that is currently used in the revised Plan.

**22. Section 4.7.2, Sample Collection Quality Control and Quality Assurance, lines 30-32, page 53**

**Permittee Statement:** "Due to recurring detections of bis(2-ethylhexyl) phthalate, a plasticizer and a common laboratory and sampling contaminant, the use of materials containing bis(2-ethylhexyl) phthalate will be avoided in the field and laboratory."

**NMED Comment:** NMED acknowledges the proposed modification regarding the elimination of the use of materials containing bis(2-ethylhexyl) phthalate. In the future groundwater monitoring reports, discuss whether the modification reduced/eliminated the detections of bis(2-ethylhexyl) phthalate. No revision is required to the current Plan.

**23. Section 5.0, Monitoring and Sampling Program, lines 2-4, page 56**

**Permittee Statement:** "Interim groundwater monitoring and sampling at FWDA allows the Army to track contaminant plume concentrations and migration at previously identified groundwater impact areas while the remedial facility investigation (RFI) and corrective measures study (CMS) are completed."

**NMED Comment:** In the *List of Abbreviations and Acronyms*, page 14, acronym “RFI” is identified as “Resource Conservation and Recovery Act Facility Investigation”. For consistency, the same acronym must not be applied to different meanings (i.e., Resource Conservation and Recovery Act Facility Investigation and remedial facility investigation). Spell out remedial facility investigation to avoid confusion. Revise the Plan accordingly.

**24. Section 5.1, Interim Groundwater Monitoring Analytical Program, lines 27-28, page 56**

**Permittee Statement:** “Forty-two analytes in Table 5-1 have screening values lower than the laboratory limit of quantitation (LOQ), or limit of detection (LOD); thus, are identified as data quality exceptions.”

**NMED Comment:** According to the December 22, 2023 Report, the limits of detection (LOD)/quantitation (LOQ) values of some analytes listed as data quality exception compounds (e.g., 2,4-dinitrotoluene, 2,6-dinitrotoluene, nitrobenzene, PETN, alpha-BHC) did not exceed the selected screening levels. Although these analytes have been identified as data quality exception compounds at one point, they have not always been identified as such. The distinction may be caused by a difference in dilutions used by the laboratory. The listed forty-two analytes may or may not be data quality exception compounds; therefore, the statement can be misleading. Resolve the issue in the revised Plan. In addition, all laboratory analyses must be conducted by using minimum attainable dilution factors without adversely affecting equipment in order to reduce LOD/LOQ, where applicable. Acknowledge this provision in the revised Plan.

**25. Section 5.2, Monitoring Location and Frequency, line 5, page 58**

**Permittee Statement:** “Table 5-2 contains the sampling matrix in accordance with this GWMP.”

**NMED Comment:** Table 5-2, *Northern Area Groundwater Sampling Matrix*, does not include the provisions required by the NMED’s July 19 2022 Disapproval. Address the following issues:

- a) Comment 2b of the NMED’s July 19 2022 Disapproval states, “[t]he Permittee recommended conducting additional groundwater sampling and analysis of herbicides for wells MW36S, BGMW13D, and BGMW07 in the May 6, 2022 letter. However, herbicide analysis was not proposed for wells MW36S and BGMW13D in the Plan. Propose to conduct herbicide analysis for these wells in the revised Plan.” Table 5-2 does not indicate that herbicide analysis is proposed for these wells. Propose to conduct the required analysis or provide an explanation for why the analysis is not proposed in the revised Plan.



- b) Comment 2c of the NMED's July 19 2022 Disapproval states, "[p]ropose to conduct pesticides analysis for the groundwater samples collected from wells TMW40S and TMW52, as required by Comment 53 of the NMED's January 25, 2022 Disapproval." Table 5-2 does not indicate that pesticides analysis is proposed for these wells. Propose to conduct the required analysis or provide an explanation for why the analysis is not proposed in the revised Plan.
- c) It is unclear whether or not Comments 2d through i of the NMED's July 19 2022 Disapproval were addressed in the 2024 Plan. Explain whether or not these comments were addressed in the response letter. Address them in the revised Plan, as applicable.

**26. Section 5.2.1, Northern Area Alluvial Groundwater Monitoring Design, Perchlorate Plume, lines 23-25, page 58**

**Permittee Statement:** "To monitor plume migration along the downgradient boundary of the plume, TMW03, TMW13, and TMW41 are designated for perchlorate analysis."

**NMED Comment:** Alluvial well TMW56 is also critically located to delineate the boundary of the perchlorate plume. It is essential to retain a groundwater sample for perchlorate analysis from well TMW56. If the groundwater in well TMW56 is limited after purging, collect a perchlorate sample first or extend the time for groundwater recharge, as necessary, and document the deviation associated with field sampling procedures in future groundwater periodic monitoring reports. Revise the Plan accordingly.

**27. Section 5.2.1, Northern Area Alluvial Groundwater Monitoring Design, Other Organics Monitoring, lines 9-10, page 59**

**Permittee Statement:** "The GRO releases are monitored by wells MW01, MW02, MW03, MW18D, MW20, MW22D, and TMW33."

**NMED Comment:** Comment 2h of the NMED's July 19 2022 Disapproval states, "Comment 27 of the NMED's July 1, 2020 Disapproval states, "[p]ropose to collect groundwater samples from wells TMW06, TMW07, and TMW21 for TPH-GRO analysis." Although it appears that this comment was addressed, the discussion was not included in the Plan." TPH-GRO analysis was required for the groundwater samples collected from wells TMW06, TMW07, and TMW21 in addition to the above-listed wells. Although Table 5-2 indicates that TPH-GRO analysis is proposed for wells TMW06, TMW07, and TMW21, the statement does not include these three wells. Resolve the discrepancy in the revised Plan.

**28. Section 5.2.2, Northern Area Bedrock Groundwater Monitoring Design, Perchlorate Plume, lines 28-30, page 59**

**Permittee Statement:** "To monitor the plume boundary wells TMW32, TMW36, TMW38, TMW39D, and TMW40D are designated as downgradient wells. Additional wells were installed in 2019 to further assess the perchlorate plume."

**NMED Comment:** The discussion in all relevant sections of the Plan must incorporate the new wells installed in 2019. The Plan pertains to year 2024 groundwater monitoring and the content of the Plan must be updated to include the new wells installed in 2019. Revise the Plan accordingly.

**29. Section 5.3.2, Analytical Data Quality Requirements, Precision, lines 16-18, page 61**

**Permittee Statement:** "The relative percent difference of field duplicates, laboratory duplicates, and MS/MSD pairs will be calculated and evaluated with the limits included in Table 5-1."

**NMED Comment:** Table 5-1 provides the screening level for each analyte. The relative percent difference of field duplicates, laboratory duplicates, and MS/MSD pairs are not relevant to the listed screening levels. Include a table that presents the criteria for relative percent difference of field duplicates, laboratory duplicates, and MS/MSD pairs in the revised Plan.

**30. Section 5.3.2, Analytical Data Quality Requirements, Accuracy and Bias, lines 20-21, page 61**

**Permittee Statement:** "Accuracy is the degree of agreement between a sample result and a reference value. Bias refers to the systematic inaccuracy associated with a measurement process."

**NMED Comment:** PFAS analysis is required for future groundwater sampling events. In order to ensure accuracy and precision of PFAS analytical results, NMED recommends using the isotope dilution quality assurance, which will quantify the lost quantity of analytes through entire laboratory procedures. Include the provision in the revised Plan, as appropriate.

**31. Section 5.3.2, Analytical Data Quality Requirements, Accuracy and Bias, lines 28-30, page 61**

**Permittee Statement:** "The percentage recovery of laboratory control samples and MS samples will be evaluated with the percentage limits in Table 5-1."



**NMED Comment:** Table 5-1 provides the screening level for each analyte. The percentage recovery of laboratory control and MS samples is not relevant to the screening level. Include a table that presents the criteria for the percentage recovery of laboratory control and MS samples in the revised Plan.

**32. Section 5.3.2, Analytical Data Quality Requirements, Comparability, lines 13-16, page 62**

**Permittee Statement:** “Also, field triplicate samples may be collected if directed by USACE, sent to a different laboratory (to be determined), and results compared to the field results. Data will be considered in disagreement if the difference in values exceeds criteria for relative percent difference listed in Table 5-1.”

**NMED Comment:** Address the following:

- a) Comment 2a of the NMED’s July 19 2022 Disapproval states, “[t]he nitrite concentrations in groundwater samples collected from wells MW27, MW35, and [T]MW59 may have been reported inaccurately. Propose to split the nitrite samples collected from the wells and use two different analytical laboratories to conduct nitrite analysis in the revised Plan, as appropriate.” Address this comment in the revised Plan.
- b) Table 5-1 provides the screening level for each analyte. The relative percent difference will not be evaluated with the screening level. Include an additional table that presents the criteria for relative percent difference in the revised Plan.

**33. Section 6.0, Schedule, lines 2-3, page 65**

**Permittee Statement:** “The first sample collection under this Interim Northern Area GWMP took place in April 2008 and has continued each April and October to date.”

**NMED Comment:** It is NMED’s opinion that it is essential for the Permittee to attain an approval of the plan update before April of each year so that the Permittee can conduct the first sampling event in accordance with the approved plan. However, multiple deficiencies are identified in the Plan, as documented in this letter. An issuance of a disapproval makes it impossible for the Permittee to conduct upcoming groundwater monitoring/sampling events in accordance with the updated plan. In order to expedite NMED’s review and attain approval, it is crucial that the contents of the updated plan align with its purpose (see Comment 2 above), and the previous NMED comments relevant to the updated plan are addressed. No revision is required to the Plan.

**34. Section 7.0, Sampling Changes from Previous Plan, line 9, page 66**

**Permittee Statement:** “The revised analytical program is listed in Table 5-2.”

**NMED Comment:** Comment 1 of the NMED's July 19, 2022 Disapproval states, "[a]lthough Section 7.0 (Sampling Changes from Previous Plan) briefly discusses proposed changes to the previous monitoring and sampling plan, it lacks detail and the discussion is not sufficient. The Permittee must present all proposed changes to the previous plan and provide the basis for each proposed change requested by the Permittee or required by NMED. Relevant correspondence must be referenced for all proposed changes required by NMED. Comment 32 of the NMED's July 27, 2020 Disapproval also states, "Table 5-2, Northern Area Groundwater Sampling Matrix, and the text of the Plan lack an explanation for the changes made to the Plan (e.g., inclusion or exclusion of new or existing wells and analytical suite). The revised Plan must include a section that summarizes all changes made to the previous sampling matrix. If the change was directed by NMED, provide a reference to the direction. If the change is proposed by the Permittee, provide a basis for the proposed change." This direction was not adequately followed." Disapproval Comment 1 applies to the 2024 Plan. Specific directions for the changes to the Plan were provided by previous NMED letters; however, the directions were not adequately followed or acknowledged. Address all of the comments contained in the NMED's July 19, 2022 Disapproval, where applicable, in the revised Plan.

**35. Section 7.0, Sampling Changes from Previous Plan, lines 22-24, page 66**

**Permittee Statement:** "BGMW11, BGMW12, BGMW13D, BGMW13S: Remove analyses for pesticides, PCBs, and herbicides based on no detections above screening levels for four or more sampling events."

**NMED Comment:** Comment 2b of the NMED's July 19, 2022 Disapproval states, "[t]he Permittee recommended conducting additional groundwater sampling and analysis of herbicides for wells MW36S, BGMW13D, and BGMW07 in the May 6, 2022 letter. However, herbicide analysis was not proposed for wells MW36S and BGMW13D in the Plan. Propose to conduct herbicide analysis for these wells in the revised Plan." It is unclear whether this comment was already addressed. Address the comment in the revised Plan, as applicable, and state if the comment was addressed in the response letter.

**36. Section 7.0, Sampling Changes from Previous Plan, lines 16-17 and 33-34, page 66 and lines 1-2, page 67**

**Permittee Statements:** "Wells with detections of explosives or TPH-DRO are proposed to be analyzed for SVOCs in the subsequent sampling event." and, "MW20: Remove analyses for explosives, SVOCs, and pesticides based on no detections above screening levels for four or more sampling events." and, "MW22D: Remove analyses for explosives, SVOCs, and pesticides based on no detections above screening levels for four or more sampling events."

**NMED Comment:** The TPH-DRO concentrations in the groundwater samples collected from wells MW20 and MW22D exceeded the applicable screening level in 2021/2022 according



to the November 2023 Report. Therefore, the statements contradict one another by proposing to remove SVOCs from the analytical suite. Resolve the discrepancy in the revised Plan. In addition, the 2023 Plan states, “[t]he points of release for the SVOCs in the Northern Area include SWMU 6 (Building 11, former Locomotive Shop) and SWMU 45 (Building 6 Gas Station). There are no groundwater SVOC plumes identified at FWDA; however, wells MW20, MW22D, TMW33, and TMW46 are designated to monitor suspected releases of petroleum fuels at SWMU 6 and known releases of fuels at SWMU 45 (Figure 3-8).” Thus, SVOC analysis must be included for the analytical suite of MW20 and MW22D. Revise the Plan accordingly.

**37. Section 7.0, Sampling Changes from Previous Plan, lines 9-10, page 67**

**Permittee Statement:** “SMW01: Remove analyses for explosives, major anions, perchlorate, and SVOCs based on no detections above screening levels for four or more sampling events.”

**NMED Comment:** The chloride and sulfate concentrations in the groundwater samples collected from well SMW01 exceeded the applicable screening levels in 2021 and 2022 according to the November 2023 Report. Resolve the discrepancy in the revised Plan. In addition, major anions analysis must be included for the analytical suite of SMW01 due to the exceedances in the revised Plan.

**38. Section 7.0, Sampling Changes from Previous Plan, lines 11-12, page 67**

**Permittee Statement:** “TMW01: Remove analysis for explosives based on no detections above screening levels for four or more sampling events.”

**NMED Comment:** Well TMW01 is located upgradient of the RDX plume and defines the southern boundary of the plume. In addition, the 2023 Plan states, “[t]o monitor suspected [explosive compounds] releases from SWMU 27 (Building 528 Complex), wells TMW01, TMW31S, and TMW41 are designated for explosives analysis even though they are hydraulically upgradient of SWMU 1.” Therefore, explosive compound analysis must be included for the analytical suite of TMW01. Revise the Plan accordingly.

**39. Section 7.0, Sampling Changes from Previous Plan, lines 13-14, page 67**

**Permittee Statement:** “TMW03, TMW04, TMW06: Remove analysis for SVOCs based on [sic] based on no detections above screening levels for four or more sampling events.”

**NMED Comment:** Wells TMW03 and TMW04 are closely located north of the TNT Leaching Bed. It is possible to detect degradation products of explosive compounds (i.e., SVOCs) in the groundwater samples collected from wells TMW03 and TMW04. Well TMW06 is located within the Administration Area where the TPH-DRO plume has been present. It is possible

to detect the constituents of petroleum hydrocarbons (i.e., SVOCs) in the groundwater samples collected from well TMW06. Therefore, SVOC analysis must be included for the analytical suite of TMW03, TMW04, and TMW06. Revise the Plan accordingly.

**40. Section 7.0, Sampling Changes from Previous Plan, lines 22-23, page 67**

**Permittee Statement:** “TMW15: Remove analyses for explosives, perchlorate, and SVOCs based on no detections above screening levels for four or more sampling events.”

**NMED Comment:** Well TMW15 is located near the perchlorate plume and defines the boundary of the plume. Therefore, perchlorate analysis must be included for the analytical suite of TMW15. However, the proposed removal of explosive compounds and SVOC analyses from the analytical suite of TMW15 is hereby approved. Revise the Plan accordingly.

**41. Section 7.0, Sampling Changes from Previous Plan, lines 24-25, page 67**

**Permittee Statement:** “TMW21: Remove analysis for explosives based on no detections above screening levels for four or more sampling events.”

**NMED Comment:** Well TMW21 is located near the western boundary of the RDX plume and defines the boundary of the plume. Therefore, explosive compound analysis must be included for the analytical suite of TMW21. Revise the Plan accordingly.

**42. Section 7.0, Sampling Changes from Previous Plan, lines 26-27, page 67**

**Permittee Statement:** “TMW22: Remove analyses for explosives, perchlorate, and SVOCs based on no detections above screening levels for four or more sampling events.”

**NMED Comment:** Well TMW22 is located near the eastern boundary of the RDX plume and defines the boundary of the plume. Therefore, explosive compound analysis must be included for the analytical suite of TMW22. However, the proposed removal of perchlorate and SVOCs analyses from the analytical suite of TMW22 is hereby approved. Revise the Plan accordingly.

**43. Section 7.0, Sampling Changes from Previous Plan, lines 5-6, page 68**

**Permittee Statement:** “TMW29: Remove analysis for explosives based on no detections above screening levels for four or more sampling events.”

**NMED Comment:** Well TMW29 is located near the western boundary of the RDX plume and defines the boundary of the plume. Therefore, explosive compound analysis must be included for the analytical suite of TMW29. Revise the Plan accordingly.



**44. Section 7.0, Sampling Changes from Previous Plan, lines 7-8, page 68**

**Permittee Statement:** “TMW31S: Remove analyses for explosives, SVOCs, and pesticides based on no detections above screening levels for four or more sampling events.”

**NMED Comment:** Well TMW31S is located near the TNT Leaching Bed, which is the source area of the RDX plume and defines the boundary of the plume. In addition, the 2023 Plan states, “[t]o monitor suspected [explosive compounds] releases from SWMU 27 (Building 528 Complex), wells TMW01, TMW31S, and TMW41 are designated for explosives analysis even though they are hydraulically upgradient of SWMU 1.” Therefore, explosive compound analysis must be included for the analytical suite of TMW31S. Revise the Plan accordingly.

**45. Section 7.0, Sampling Changes from Previous Plan, lines 9-10, page 68**

**Permittee Statement:** “TMW33: Remove analysis for SVOCs based on no detections above screening levels for four or more sampling events.”

**NMED Comment:** Well TMW33 is located within the Administration Area where the TPH-DRO plume has been present. The TPH-DRO concentrations in the groundwater samples collected from well TMW33 exceeded the applicable screening level in 2021 and 2022. It is possible to detect the constituents of petroleum hydrocarbons (i.e., SVOCs) in the groundwater samples collected from well TMW33. In addition, the 2023 Plan states, “[t]he points of release for the SVOCs in the Northern Area include SWMU 6 (Building 11, former Locomotive Shop) and SWMU 45 (Building 6 Gas Station). There are no groundwater SVOC plumes identified at FWDA; however, wells MW20, MW22D, TMW33, and TMW46 are designated to monitor suspected releases of petroleum fuels at SWMU 6 and known releases of fuels at SWMU 45 (Figure 3-8).” Therefore, SVOC analysis must be included for the analytical suite of TMW33. Revise the Plan accordingly.

**46. Section 7.0, Sampling Changes from Previous Plan, lines 11-12, page 68**

**Permittee Statement:** “TMW35: Remove analyses for SVOCs and pesticides based on no detections above screening levels for four or more sampling events.”

**NMED Comment:** Well TMW35 is located within the Administration Area where the TPH-DRO plume has been present. It is possible to detect the constituents of petroleum hydrocarbons (i.e., SVOCs) in the groundwater samples collected from well TMW35. Therefore, SVOC analysis must be included for the analytical suite of TMW35. However, the proposed removal of pesticides analysis from the analytical suite of TMW35 is hereby approved. Revise the Plan accordingly.

**47. Section 7.0, Sampling Changes from Previous Plan, lines 13-14, page 68**

**Permittee Statement:** “TMW39S: Remove analyses for explosives, SVOCs, and pesticides based on no detections above screening levels for four or more sampling events.”

**NMED Comment:** Well TMW39S is located near the TNT Leaching Bed, which is the source area of the RDX plume and defines the boundary of the plume. Therefore, explosive compound analysis must be included for the analytical suite of TMW39S. SVOC analysis must also be continued for TMW39S because it is possible to detect degradation products of explosive compounds. However, the proposed removal of pesticides analysis from the analytical suite of TMW39S is hereby approved. Revise the Plan accordingly.

**48. Section 7.0, Sampling Changes from Previous Plan, lines 21-22, page 68**

**Permittee Statement:** “TMW44: Remove analyses for explosives, SVOCs, and pesticides based on no detections above screening levels for four or more sampling events.”

**NMED Comment:** Well TMW44 is located near the eastern boundary of the RDX plume and defines the boundary of the plume. Therefore, explosive compound analysis must be included for the analytical suite of TMW44. SVOC analysis must also be continued for TMW44 because it is possible to detect degradation products of explosive compounds. The proposed removal of pesticides analysis from the analytical suite of TMW44 is hereby approved. Revise the Plan accordingly.

**49. Section 7.0, Sampling Changes from Previous Plan, lines 23-24, page 68**

**Permittee Statement:** “TMW45: Remove analyses for explosives, perchlorate, SVOCs, and pesticides based on no detections above screening levels for four or more sampling events.”

**NMED Comment:** Well TMW45 is located near the northeastern boundary of the RDX plume and defines the boundary of the plume. Therefore, explosive compound analysis must be included for the analytical suite of TMW45. SVOC analysis must also be continued for TMW45 because it is possible to detect degradation products of explosive compounds. However, the proposed removal of perchlorate and pesticides analyses from the analytical suite of TMW45 is hereby approved. Revise the Plan accordingly.

**50. Section 7.0, Sampling Changes from Previous Plan, lines 25-26, page 68**

**Permittee Statement:** “TMW46: Remove analyses for explosives, SVOCs, and pesticides based on no detections above screening levels for four or more sampling events.”

**NMED Comment:** Well TMW46 is located downgradient of the TPH-DRO and TPH-GRO plumes and defines the boundary of the plumes. It is possible to detect the constituents of petroleum hydrocarbons (i.e., SVOCs) in the groundwater samples collected from well TMW46. In addition, the 2023 Plan states, “[t]he points of release for the SVOCs in the



Northern Area include SWMU 6 (Building 11, former Locomotive Shop) and SWMU 45 (Building 6 Gas Station). There are no groundwater SVOC plumes identified at FWDA; however, wells MW20, MW22D, TMW33, and TMW46 are designated to monitor suspected releases of petroleum fuels at SWMU 6 and known releases of fuels at SWMU 45 (Figure 3-8).” Therefore, SVOC analysis must be included for the analytical suite of TMW46. However, the proposed removal of explosive compounds and pesticides analyses from the analytical suite of TMW46 is hereby approved. Revise the Plan accordingly.

**51. Section 7.0, Sampling Changes from Previous Plan, lines 27-28, page 68**

**Permittee Statement:** “TMW47: Remove analyses for perchlorate and pesticides based on no detections above screening levels for four or more sampling events.”

**NMED Comment:** Well TMW47 is located downgradient of the perchlorate plume and defines the boundary of the plume. Therefore, perchlorate analysis must be included for the analytical suite of TMW47. However, the proposed removal of pesticides analyses from the analytical suite of TMW47 is hereby approved. Revise the Plan accordingly.

**52. Section 7.0, Sampling Changes from Previous Plan, lines 32-34, page 68**

**Permittee Statement:** “BGMW07: Remove analyses for explosives, major anions, perchlorate, SVOCs, pesticides, and PCBs based on no detections above screening levels for four or more sampling events.”

**NMED Comment:** Well BGMW07 is the background well that can be used to assess the naturally occurring levels of anions and perchlorate. Therefore, major anions and perchlorate analyses must be included for the analytical suite of BGMW07. In addition, in order to demonstrate that the groundwater samples collected from well BGMW07 are representative of background conditions, it is recommended to continue analyses of explosive compounds, SVOCs, pesticides, and PCBs. Revise the Plan accordingly.

**53. Section 7.0, Sampling Changes from Previous Plan, lines 1-3, page 69**

**Permittee Statement:** “BGMW08, BGMW09, BGMW10: Remove analyses for explosives, perchlorate, SVOCs, pesticides, and PCBs based on no detections above screening levels for four or more sampling events.”

**NMED Comment:** Wells BGMW08, BGMW09, and BGMW10 are the background wells that can be used to assess the naturally occurring levels of perchlorate. Therefore, perchlorate analysis must be included for the analytical suite of BGMW08, BGMW09, and BGMW10. In addition, in order to demonstrate that the groundwater samples collected from wells BGMW08, BGMW09, and BGMW10 are representative of background conditions, it is recommended to continue analyses of explosive compounds, SVOCs, pesticides, and PCBs.

Revise the Plan accordingly.

**54. Section 7.0, Sampling Changes from Previous Plan, lines 4-5, page 69**

**Permittee Statement:** "TMW14A: Remove analyses for explosives, major anions, and SVOCs based on no detections above screening levels for four or more sampling events."

**NMED Comment:** The proposed removal of explosive compounds, and anions analyses from the analytical suite of TMW14A is hereby approved. However, the 2023 Plan states, "[s]uspected [SVOCs] releases will be monitored by wells TMW14A and TMW16 located downgradient in the western portion of the Workshop Area (Figure 3-13)." Therefore, SVOC analysis must be retained for the analytical suite of TMW14A. In addition, well TMW14A is located near the perchlorate plume and may define the boundary of the plume more accurately. Although perchlorate analysis is not included for the analytical suite of TMW14A, propose to conduct perchlorate analysis for TMW14A. Revise the Plan accordingly.

**55. Section 7.0, Sampling Changes from Previous Plan, lines 6-7, page 69**

**Permittee Statement:** "TMW16: Remove analyses for explosives, perchlorate, and SVOCs based on no detections above screening levels for four or more sampling events."

**NMED Comment:** The proposed removal of explosive compounds, and perchlorate analyses from the analytical suite of TMW16 is hereby approved. However, the 2023 Plan states, "[s]uspected [SVOCs] releases will be monitored by wells TMW14A and TMW16 located downgradient in the western portion of the Workshop Area (Figure 3-13)." Therefore, SVOC analysis must be retained for the analytical suite of TMW16. Revise the Plan accordingly.

**56. Section 7.0, Sampling Changes from Previous Plan, lines 8-9, page 69**

**Permittee Statement:** "TMW17: Remove analyses for major anions based on no detections above screening levels for four or more sampling events."

**NMED Comment:** Although nitrate and nitrite have been monitored for four or more sampling events for well TMW17, other anions (i.e., bromide, chloride, fluoride, phosphate, and sulfate) have not been monitored for four or more sampling events. In addition, although the concentrations of chloride, fluoride, and sulfate have not exceeded the applicable screening levels in the past, the concentrations were very close to the screening levels and may potentially exceed the screening levels in the future. Therefore, major anions analysis must be continued for TMW17. Revise the Plan accordingly.

**57. Section 7.0, Sampling Changes from Previous Plan, lines 16-17, page 69**



**Permittee Statement:** “TMW31D, TMW32: Remove analyses for explosives, SVOCs, and pesticides based on no detections above screening levels for four or more sampling events.”

**NMED Comment:** Wells TMW31D and TMW32 are located near the TNT Leaching Bed and may be useful to evaluate potential vertical migration of explosive compounds. Therefore, explosive compound analysis must be included for the analytical suite for TMW31D and TMW32. However, the proposed removal of SVOC and pesticides analyses from the analytical suite of TMW31D and TMW32 is hereby approved. Revise the Plan accordingly.

**58. Section 7.0, Sampling Changes from Previous Plan, lines 18-19, page 69**

**Permittee Statement:** “TMW36: Remove analyses for explosives, SVOCs, and pesticides based on no detections above screening levels for four or more sampling events.”

**NMED Comment:** Well TMW36 is located near the TNT Leaching Bed and may be useful to evaluate potential vertical migration of explosive compounds. The well vertically defines the boundary of the alluvial plume. Therefore, explosive compound analysis must be included for the analytical suite for TMW36. However, the proposed removal of SVOC and pesticides analyses from the analytical suite of TMW36 is hereby approved. Revise the Plan accordingly.

**59. Section 7.0, Sampling Changes from Previous Plan, lines 20-21, page 69**

**Permittee Statement:** “TMW37: Remove analyses for explosives, perchlorate, SVOCs, and pesticides based on no detections above screening levels for four or more sampling events.”

**NMED Comment:** Well TMW37 is located on the eastern boundary of the perchlorate plume and defines the boundary of the plume. Therefore, perchlorate analysis must be included for the analytical suite for TMW37. However, the proposed removal of explosive compound, SVOC, and pesticides analyses from the analytical suite of TMW37 is hereby approved. Revise the Plan accordingly.

**60. Section 7.0, Sampling Changes from Previous Plan, lines 24-25, page 69**

**Permittee Statement:** “TMW39D, TWM40D, TMW48: Remove analyses for explosives, SVOCs, and pesticides based on no detections above screening levels for four or more sampling events.”

**NMED Comment:** Wells TMW39D, TWM40D, and TMW48 are located near the TNT Leaching Bed and may be useful to evaluate potential vertical migration of explosive compounds. Therefore, explosive compound analysis must be continued for TMW39D, TWM40D, and TMW48. However, the proposed removal of SVOC and pesticides analyses from the analytical suite of TMW39D, TWM40D, and TMW48 is hereby approved. Revise

the Plan accordingly.

**61. Figures 3-3 through 3-10, Groundwater Monitoring Alluvial Wells**

**NMED Comment:** New alluvial wells depicted in Figure 2-4, *Northern Area Site Wells*, are not included in Figures 3-3 through 3-10. Include the new alluvial wells in the revised Figures 3-3 through 3-10 and provide a discussion for groundwater monitoring design in Section 5.2.1 with an inclusion of new alluvial wells in the revised Plan.

**62. Figures 3-11 through 3-13, Groundwater Monitoring Bedrock Wells**

**NMED Comment:** New bedrock wells depicted in Figure 2-4, *Northern Area Site Wells*, are not included in Figures 3-11 through 3-13. Include the new bedrock wells in the revised Figures 3-11 through 3-13 and provide a discussion for groundwater monitoring design in Section 5.2.2 with an inclusion of new bedrock wells in the revised Plan.

**63. Table 5-1, Groundwater Screening Levels, Detection Limits, and Control Limits**

**NMED Comment:** Table 5-1 provides the screening level for each analyte; however, it does not provide the detection limit, and control limit for each analyte. Include the relevant information in the revised Table 5-1, or provide a separate table that presents the detection limit, and control limit for each analyte.

The Permittee must submit the revised Plan that addresses all comments contained in this letter. Two hard copies and an electronic version of the revised Plan must be submitted to the NMED. The Permittee must also include a redline-strikeout version in electronic format showing where all revisions to the Plan have been made. The revised Plan must be accompanied by a response letter that details where all revisions have been made to the Plan, cross-referencing NMED's numbered comments. The revised Plan must be submitted to NMED no later than **April 30, 2024**.

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: 2024.03.19 10:38:21 -06'00'

Ricardo Maestas  
Acting Chief  
Hazardous Waste Bureau

cc: N. Dhawan, NMED HWB  
B. Wear, NMED HWB



Mr. Cushman  
March 19, 2024  
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M. Suzuki, NMED HWB  
L. King, EPA Region 6 (6LCRRC)  
S. Begay-Platero, Navajo Nation  
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File: FWDA 2024 and Reading

