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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

May 21, 2019

Mark Patterson
BRAC Environmental Coordinator
Fort Wingate Depot Activity
13497 Elton Road
North Lima, OH 44452

Steve Smith
USACE
CESWF-PER-DD
819 Taylor Street, Room 3B06
Fort Worth, TX 76102

**RE: APPROVAL WITH MODIFICATIONS
FINAL 2017 INTERIM FACILITY-WIDE GROUNDWATER MONITORING
PLAN, VERSION 10 REVISION 1, RESPONSE TO NMED APPROVAL WITH
MODIFICATIONS LETTER DATED OCTOBER 22, 2018
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-17-007**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *Final 2017 Interim Facility-wide Groundwater Monitoring Plan, Version 10 Revision 1, Response to NMED Approval with Modifications Letter dated October 22, 2018* (Response) dated April 25, 2019. NMED has reviewed the Response and hereby issues this Approval with Modifications. The Permittee must address the following comments.

1. The Permittee's Response to NMED's Approval with Modifications Comment 2

Permittee Statement: "The Army plans to provide a more detailed plan and strategy regarding this issue in the upcoming weeks and will provide this to NMED for further discussion. Upon receipt of NMED concurrence, the Army will implement the enhanced analytical procedures for 4 consecutive sampling rounds. If the presence of compounds

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requiring these special analytical methods is not confirmed, the analytical program will revert to the normal methods that were previously used.”

NMED Comment: The Permittee secured a laboratory that is able to achieve adequately low limits of quantification (LOQs) for most contaminants. NMED approves implementation of the enhanced analytical procedures. Propose all changes associated with the enhanced analytical procedures in the next Interim Facility-Wide Groundwater Monitoring Plan (IFGMP) update. However, the Permittee also states, “[i]f the presence of compounds requiring these special analytical methods is not confirmed [in four consecutive sampling rounds], the analytical program will revert to the normal methods that were previously used.” The Permittee is required to utilize appropriate analytical labs and methods that are capable of achieving LOQs below the respective SSLs. Unless a sufficient and reasonable explanation is provided, the Permittee must continue to utilize methods capable of achieving LOQs less than the cleanup levels for all future sampling events.

The Permittee states, “[i]n addition, the previous research showed that n-nitrodimethylamine [NDMA] was not utilized at Fort Wingate Depot Activity (FWDA).” A large portion of the facility is currently leased to and is being utilized by the Missile Defense Agency (MDA). Activities undertaken by MDA are likely to include utilization of rocket fuels. The LOQ provided by the Permittee in replacement Table 5-1 appears to be four orders of magnitude higher than the SSL. Other facilities under NMED RCRA oversight have been able to contract with analytical laboratories that are able to achieve LOQs much closer to the SSL. One facility has utilized ALS labs in Ontario, Canada to achieve 0.5 to 1.0 ng/L. Another facility has utilized TestAmerica Labs to achieve 4 to 5 ng/L. Therefore, an LOQ of 10 µg/L, which is four orders of magnitude greater than the what the two labs listed above are able to achieve, is not acceptable. NMED cannot defend the assertion that NDMA contamination does not exist at FWDA based on laboratory analysis that can only achieve LOQs that are four orders of magnitude higher than the SSL. If the Permittee cannot provide data that meets the standards, then it will not be possible to demonstrate that releases related to MDA operations have not occurred.

2. The Permittee’s Response to NMED’s Approval with Modifications Comment 6

Permittee Statement: “NMED concurred that the Army can remove EDB from the analytical suite in Comment 5 of the Northern Area Supplemental Groundwater RFI, Revision 1, NOD letter, dated 21 March 2017.”

NMED Comment: NMED previously concurred that the Permittee could remove EDB from the analytical suite. Accordingly, the Permittee is not required to include EDB analysis in the future IFGMP.

The Permittee must address all comments in this Approval with Modifications in the upcoming IFGMP annual revision.



Messrs. Patterson and Smith

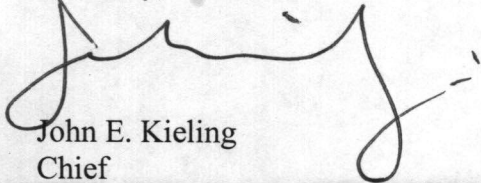
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This approval is based on the information presented in the document as it relates to the objectives of the work identified by NMED at the time of review. Approval of this document does not constitute agreement with all information or every statement presented in the document.

Should you have any questions, please contact Michiya Suzuki of my staff at (505) 476-6059.

Sincerely,



John E. Kieling

Chief

Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
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File: FWDA 2019 and Reading, Groundwater