



DEPARTMENT OF THE ARMY
OFFICE OF THE ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT
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WASHINGTON, DC 20310-0600

August 22, 2019

Base Realignment and Closure Division

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

RE: Final Revision 1 Parcel 3 Groundwater RCRA Facility Investigation Report, Fort Wingate Depot Activity, McKinley County, New Mexico, EPA ID#NM6213820974, HWB-FWDA-18-001

Dear Mr. Kieling:

This letter is in reply to the New Mexico Environment Department (NMED) Approval with Modifications letter dated June 14, 2019, regarding the Final Revision 1 Parcel 3 Groundwater RCRA Facility Investigation Report, Fort Wingate Depot Activity (FWDA) under RCRA Permit ID No. NM6213820974. The following are the Army's responses to comments as requested by NMED.

Comments

- 1) NMED Approval with Modifications Comment #1:** The laboratory reports submitted with the Report are Level IV reports. The Permittee has previously been directed to not submit Level IV analytical laboratory reports. NMED's November 7, 2018 *Disapproval Final Permittee-Initiated Interim Measures Report Parcel 6, Revision 1* (Disapproval) states:

"The Report includes Level IV reports from the analytical laboratories. This has resulted in over 18,000 pages of laboratory reports for this Report. These reports are unneeded and cumbersome. NMED requests that only Level II analytical laboratory reports be included in all submittals. Revise the Report by removing Level IV analytical reports and including Level II analytical reports."

This is a recurring issue; failure to follow NMED direction constitutes noncompliance and may result in an enforcement action. Include Level II rather than Level IV analytical reports in future reports.

Army Response: Concur, the Army previously submitted Level IV analytical reports to provide full documentation regarding analytical quality control. The Army has now instructed all its contractors to submit Level 2 analytical reports for all future reports.

- 2) **NMED Approval with Modifications Comment #2:** The Permittee provided large quantities of data with no indication where to locate a specific sample within a specific analytical laboratory report. NMED's November 7, 2018 Disapproval states:
- "For every document that includes analytical data, provide a link for each specific sample to a specific lab report filename (if multiple files are provided) or to a page number in the appendix where the specific lab report can be found (if multiple lab reports are combined into one large file). For Appendices C and F, the lab reports are indexed by lab report number. The Permittee must provide a link to the lab report number for each analyte. For Appendix J, no indexing is provided and multiple laboratory reports are combined. The Permittee must either provide indexing for each report and indicate which particular report contains a particular sample, or provide specific page numbers for each sample ID that indicates where the sample can be found in the lab reports. This information can be provided either in a new table or in the analytical data electronic database."

This is a recurring issue; failure to follow NMED direction constitutes noncompliance and may result in an enforcement action.

Army Response: Comment noted. NMED's comment regarding Appendix J refers to the Parcel 6 RFI Report, and not this Parcel 3 Groundwater RFI. The subject report does not have an Appendix J. Please note that the Army has previously provided electronic data in Access or Excel format for groundwater related reports (periodic monitoring reports) and included PDF analytical reports which are bookmarked and keyword searchable with any commercially available PDF reader software. This Parcel 3 Groundwater RFI contained a single, bookmarked pdf of the analytical reports and an excel spreadsheet of the data.

Per email correspondence with Mr. Wear on 01 August 2019, the Army proposes for future reports to present a searchable access or excel file that will provide for each analytical record the sample ID, results, flags and the applicable laboratory report number. Also, the Army will present pdf level II analytical reports. Each laboratory report will have the report number be the electronic file name, for easy reference to the report number provided for each analyte in the access or excel file.

3) **NMED Approval with Modifications Comment #3:**

Permittee Statement: "Taking data across 4 quarters is expected to demonstrate seasonal [groundwater] variation. Additionally, risk assessors like to have multiple rounds of data so they can demonstrate confidence in the data through statistics. It is for this reason that the Army proposed four additional rounds of data."

NMED Comment: NMED's Disapproval Comment 1 requires the Permittee to propose eight quarterly monitoring events in the Parcel 3 groundwater monitoring plan. Evaluate seasonal groundwater variation through eight rounds of data. Additionally, the Permittee may only include a discussion of risk in the final groundwater monitoring report after completing eight rounds of data collection. No response is required.

Army Response: Concur, per the NMED's Comment 1 of the Disapproval Letter dated October 17, 2018 and the Army's follow up response, please note that the Army concurs

with NMED that it will prepare an Abbreviated Groundwater Monitoring Plan that will include eight quarterly monitoring events. Please also see response to Comment 8.

4) NMED Approval with Modifications Comment #4:

Permittee Statement: "The Army will prepare a separate simplified groundwater monitoring work plan for Parcel 3 groundwater monitoring for 8 quarterly events, upon approval of requested funding."

NMED Comment: NMED's Disapproval Comment 1 states that the Permittee must submit the first periodic monitoring report and the Parcel 3 groundwater monitoring plan by April 2, 2019. Neither submittal was received. This constitutes noncompliance. It is incumbent upon the Permittee to provide appropriate funding to meet the requirements of the FWDA RCRA Permit.

Army Response: Comment noted: The Army agrees that it will prepare the subject documents. However, the Army first needs to install replacement wells that have been abandoned as a result of Interim soil removal within and around HWMU area in Parcel 3. The Army proposes to prepare a Background/Replacement Wells Work Plan and submit it for NMED review by December 31, 2019. Pending NMED approval of the Work Plan the Army will install and develop the wells after the fieldwork for the HWMU removal project is completed. This is due to operational safety distances, well proximity to HWMU excavations, and heavy ground disturbances by equipment in the HWMU which could affect groundwater concentrations. An abbreviated groundwater monitoring plan will be prepared after the installation and development of the background/replacement wells.

Please note that May 2017 data were submitted as part of the Parcel 3 RFI Report in the first submission. Per NMED's direction (Comment 1, NMED NOD letter dated October 17, 2019) the data were removed from the report as it was not collected in accordance with an approved Plan, and not usable for decision making purposes. The Army can provide a validated data package/tables of these data to NMED and will prepare a report provided NMED finds the data acceptable. Please note that the preparation of the report will not be able to begin until funding is obtained and a contract is awarded.

The Army is attempting to meet the NMED's requests within the technical, logistical and safety constraints of getting the work done. The Army respectfully requests a phone call to discuss this response with NMED if the agency has any concerns.

5) NMED Approval with Modifications Comment #5: NMED's Disapproval Comment 1 states, "title the Event 2 and subsequent 2018 periodic monitoring as the Parcel 3 Groundwater Monitoring Investigation Report (Parcel 3 GMIR) with the dates of occurrence rather than as "Event 2". The title "Event 2" was used throughout the response-to-comment (RTC) letter. NMED's direction was not followed. Reference the sampling event correctly in all future submittals.

Army Response: Comment noted. The Army will provide correct reference for the sampling events in future submittals.

6) NMED Approval with Modifications Comment #6:

Permittee Statement: "Variances from the work plan were explained further in the revised report."

NMED Comment: The revised sections of the Report must be identified in the RTC letter. In the future, include the reference where the revision was made to the revised reports in RTC letters.

Army Response: Comment noted. The Army will identify revised sections in future RTC letters.

7) NMED Approval with Modifications Comment #7:

Permittee Statements: "BGMW05 is located in the vicinity of TSB02 which was drilled prior to drilling and installing BGMW05 and BGMW05 was believed, at the time of installation, to have captured the targeted formation based on identified depths and lithologies similar to the TSB02 cores, targeting sandstone."

NMED Comment: The geological data collected from boring TSB02 was used as criteria for the installation of well BGMW05. However, well BGMW05 was installed more than 2,500 feet southeast of boring TSB02. Boring TSB02 is located too far from well BGMW05 to be a reliable point of reference; therefore, the data collected from boring TSB02 are not likely applicable to make any decisions regarding the installation of well BGMW05 (e.g., termination depth). It appears that the presence of groundwater in Parcel 3 likely depends on the distance from an arroyo rather than a particular geologic unit of lithology. Figure 2-10, Geologic Cross Section Transect Location Map, indicates that an arroyo is present approximately 1,500 feet east of well BGMW05 and the arroyo appears to be accessible from an unnamed road extending eastward from AOC 91. Evaluate accessibility in the vicinity of the arroyo and, if found accessible, submit a work plan to install a background monitoring well in the vicinity of the arroyo.

Army Response: Concur, the Army performed site reconnaissance on 24 July 2019. A location northeast of BGMW05 within Parcel 3 was identified to be potentially accessible by track-mounted equipment and within proximity of a north-trending arroyo located approximately 1,500 feet east of well BGMW05. This arroyo, identified by NMED on Figure 2-10, Geologic Cross Section Transect Location Map, is accessed by an unnamed road that extends eastward from AOC 91. Access to this arroyo is limited to areas adjacent to the unnamed road and will require track-mounted equipment.

The Army will comply with preparing a work plan to install a background well in the vicinity of the arroyo, and install a background well within Parcel 1 (See response to Comment 4 and 9).

8) NMED Approval with Modifications Comment #8:

Permittee Statement: "This data [collected from groundwater monitoring for eight quarterly events] will be utilized to determine if seasonal rainfall affects groundwater levels in Parcel 3."

NMED Comment: NMED's Disapproval Comment 13 states, "if groundwater samples can be collected from "dry" monitoring wells during periods of increased rainfall (e.g.,

monsoon season), groundwater monitoring and sampling must be conducted at that time." The New Mexico monsoon season is designated from June 15th through September 30th. To clarify, if the date of a sampling event coincides with the timeframe, additional sampling will not be necessary. The sampling events during monsoon season must be conducted within one week of significant rain event(s) to determine if rainfall affects groundwater levels. In future groundwater monitoring reports, include the date(s) when rainfall is recorded prior to the groundwater monitoring event and the amount of precipitation recorded during the rain event(s).

Army Response: Comment noted: The Army will propose performing quarterly sampling in January, April, July, and October in the abbreviated groundwater monitoring work plan. The July (third quarter) event will be performed during the monsoon season. During the monsoon season the Army will propose to take a phased approach, first to monitor rainfall in Parcel 3 and water levels within Parcel 3 dry wells to determine if any groundwater fluctuations occur following rainfall events. If it is determined that sufficient groundwater exists within the dry monitoring wells following precipitation events, then the Army will sample the wells.

Please note that the preparation of the abbreviated GW Monitoring Plan will be prepared after installing background and replacement wells (See response to comment #4).

9) NMED Approval with Modifications Comment #9:

Permittee Statements: "The Army agrees to explore alternate locations to install background monitoring wells; however, it is highly possible to not find an accessible location that will also provide representative groundwater. The Army suggests several alternative locations be proposed to allow flexibility to achieve an accessible location that does produce groundwater." and, "The accessible areas upgradient, or south, of well CMW02 had borings advanced with no success in finding groundwater. CMW32 was set as a permanent well and remains dry. BGMW04 was drilled below the targeted formation into the Blue Mesa member, as the Painted Desert formation crop out. The Blue Mesa member is a very low apparent permeability mudstone. The area in Parcel 3 is highly undeveloped with high relief terrain making access very limited."

NMED Comment: Groundwater production is unlikely in areas distant from arroyos; therefore, wells must be installed in the proximity of arroyos. If arroyos extend outside the Parcel 3 boundary, background groundwater monitoring wells may be installed outside the Parcel 3 boundary, upgradient of the affected area (e.g., Parcel 1). Potentially suitable areas maybe more accessible from Parcel 1 (e.g., via Woodland road). In addition, track-mounted drill rigs are commercially available. Such drill rigs will improve accessibility. Evaluate potential areas for background wells outside Parcel 3 and provide a discussion in the response letter.

Army Response: The Army performed site reconnaissance on 24 July 2019. A location within Parcel 1 was identified to be accessible by track-mounted drilling equipment and within proximity of the main arroyo. This location is approximately one mile south of the Parcel 3 boundary line. As mentioned in response to Comment 7, another background location was identified northeast of BGMW05. This location is also accessible and adjacent to an arroyo. The Army explored accessing the arroyo directly east of BGMW05, however steep terrain and dense vegetation prevented access by foot to that arroyo.

The Army proposes to prepare a Background/Replacement Wells Work Plan and submit for NMED review by December 31, 2019. The plan will include a replacement well for CMW18 (Comment 14). Please refer to the Army response to Comment 4.

10) NMED Approval with Modifications Comment #10:

Permittee Statements: "The Army requests to collect additional data at CMW02 and BGMW06, if and when water is present, to generate additional data to determine if constituent detections were anomalous or representative of contamination. As mentioned in Section 3.11.4.3 Uncertainty Discussion, the detections of explosives and VOCs were estimated and potentially biased high."

and, "The Army proposes the use of passive sampling, which would best facilitate the sampling in the area and allow low yield, slow recharge locations to be sampled."

NMED Comment: Evaluate whether or not the constituent detections were anomalous or representative of contamination in these wells in future reports. In addition, data acquired through the use of passive sampling devices must be correlated with analytical laboratory data for samples collected from the wells using previous sampling methods at the time of passive sample collection for at least three events to evaluate compatibility.

Army Response: Concur, the Army will evaluate whether or not the constituent detections in CMW02 and BGMW06 were anomalous or representative of contamination in future Parcel 3 groundwater monitoring reports.

The Army proposed passive sampling within Parcel 3 due to the extremely low yields. There is not enough water in the wells referenced in this comment to take passive samples and then purge the wells followed by traditional samples as in previous events.

In lieu of performing the dual samples requested by NMED in Parcel 3, the Army proposes to evaluate passive sampling (snap sampler) devices during the northern area semi-annual groundwater monitoring activities. The northern area monitoring well network has a robust historical dataset and contains wells that will produce sufficient water to collect concurrent samples using approved sampling methods. Three rounds of sampling from selected wells will be collected with passive and traditional sampling methods. The analytical laboratory data from both methods will be correlated and evaluated for compatibility. The Army will consult with NMED on which wells to sample for this effort.

11) NMED Approval with Modifications Comment #11:

Permittee Statements: "Analytical data for existing well CMW22 was removed as it was deemed out of scope of the work plan and performed during "Event 2". The Army will present the analytical data in the next Parcel 3 monitoring report and, The ink marker is also mentioned in Section ES.4 Recommendations; 5.5.2.2 Vapor Intrusion Pathway; Section 6.3.2 Groundwater East of the Hogback; and Section 6.5 Recommendations."

NMED Comment: The former statement indicates that the data for well CMW22 was removed from the Report, but the latter statement indicates that the discussion regarding the incident that references the ink marker and CMW22 was included in the Report. The analytical data must be provided when the incident is discussed. The discussion must be

presented along with the analytical data in the subsequent Parcel 3 groundwater monitoring report.

Army Response: Concur. The Army will provide a discussion and the analytical data from CMW22 in the next Parcel 3 monitoring report. Per Comment 19 of the NOD letter, NMED directed the Army to provide the safety data sheet for the ink marker inadvertently dropped into well CMW22. The Army concurred and provided an explanation stating the analytical data will be presented in the next Parcel 3 monitoring report (Army response to Comment 19). The ink marker was discussed to present the SDS in the report and document the occurrence, not present analytical data. Comment 4a, 4d, and 4g direct the Army to remove the CMW22 analytical data from the report, which the Army did.

12) NMED Approval with Modifications Comment #12:

Permittee Statement: "The Army proposes to not include BGMW06 and CMW02 within this human health risk screening as the data is limited to one sampling event."

NMED Comment: Conduct the risk evaluation upon completion of eight rounds of sampling in the final groundwater monitoring report (see Comment 3). No response is required.

Army Response: Comment noted.

13) NMED Approval with Modifications Comment #13:

Permittee Statement: "As an alternative to local background wells in Parcel 3, Army proposes using background concentrations from wells screened in the same lithologic formations in northern area background wells."

NMED Comment: It is appropriate to conduct a background study within or upgradient of the Parcel 3 boundary to evaluate the background groundwater conditions in Parcel 3. The groundwater conditions in northern area may be fundamentally different from that of Parcel 3 even if groundwater is collected from the same lithologic formations. The occurrence of groundwater in Parcel 3 may be dictated by hydraulic connections related to arroyos. This may not be the case in northern area. Therefore, the data collected from northern area are not appropriate for use to evaluate background groundwater conditions in Parcel 3.

Army Response: Concur, please see response to Comment 4, 7 and 9. The Army performed site reconnaissance on July 24, 2019. A location within Parcel 1 was identified to be accessible by track-mounted drilling equipment and within proximity of the main arroyo. Another background location was identified northeast of BGMW05. This location is also accessible and adjacent to an arroyo.

The Army proposes to prepare a Background/Replacement wells Work Plan and submit for NMED review by December 31, 2019.

14) NMED Approval with Modifications Comment #14:

Permittee Statement: "Well CMW 18 has since been abandoned due to current source removal activities being performed within Parcel 3. The well will be replaced at a later date once operations are clear of the area."

NMED Comment: Provide information regarding the date of the abandonment. NMED provided a direction not to abandon the well in the Disapproval Final Parcel 3 Groundwater RCRA Facility Investigation Report, dated October 17, 2018. Comment 28 states that wells CMW18 and CMW04 are essential to the groundwater monitoring program at the site and must not be abandoned or, if abandoned, must be replaced. The Permittee must propose to install a replacement well for CMW18 in a location outside of the HWMU operations. Submit a work plan to install a replacement well for well CMW18.

Army Response: Concur, Well CMW18 was abandoned prior to Army receiving NMED direction not to abandon the well. CMW18 was abandoned on 15 May 2017. The well was within the current HWMU excavation area and needed removal to continue operations.

CMW18 was located within the HWMU. Monitoring well CMW28b is the closest monitoring well to CMW18 outside of the HWMU and is approximately 1000 feet to the north. A replacement well for CMW18 needs to be within the vicinity of CMW18 in the HWMU to be representative, and in proximity of the arroyo.

As stated in response to Comment 4, the Army will prepare a Background/Replacement wells Work Plan for NMED's review by December 31, 2019.

15) NMED Approval with Modifications Comment #15:

Permittee Statement: "to follow NMEDs direction as stated by Mr. Wear "[t]he purpose of the RFI report is to provide information on the advancement of borings, geophysics, and the installation, development, and first round of sampling of the new wells. Further monitoring will be reported in future periodic monitoring reports.""

NMED Comment: The same quotation appears 22 times in the RTC letter. It is redundant. Reference the quotation for simplicity. No response is necessary.

Army Response: Comment noted. The changes were made in accordance with NMED direction.

16) NMED Approval with Modifications Comment #16:

Permittee Statement: "The instrument will flash "0.0" when readings are out of range. The notes were recorded because field readings were out of range and visual observations were deemed important information. The data sheets are a record of field documentation and cannot be altered."

NMED Comment: "0.0 NTU" is misleading without an explanation. When the instrument flashes "0.0", indicate that the readings are out of range in the data sheets. This comment applies to the presentation of all future field data sheets.

Army Response: Comment noted. The data sheets were marked with notations in the remarks field of the form stating either "NTU likely out of range", "**Likely over range" or descriptions of the water indicating murky or suspended fines are present. The Army will indicate the readings are out of range in all future field data sheets when the instrument flashes "0.0".

17) NMED Approval with Modifications Comment #17:

Permittee Statement: "Well 69 samples will be collected during the April 2019 sampling event and will be submitted with the January to June 2019 Periodic Monitoring Report."

NMED Comment: The analytical results for the groundwater samples collected from well 69 during Event 2 must also be submitted to NMED no later than July 12, 2019.

Army Response: Concur, the analytical results from May 2017 were submitted to NMED on 12 July 2019. The well 69 sampling performed in May 2017 was not performed under an approved work plan, thus the data is not usable for decision making purposes. The Army has since sampled Well 69 as directed by NMED during the April 2019 groundwater monitoring effort. Those data will be submitted in the January through June 2019 Groundwater Periodic Monitoring Report.

18) NMED Approval with Modifications Comment #18:

NMED Comment: 2-butanone (MEK) and acetone were detected in the groundwater samples collected from wells CMW28B and CMW33B according to the laboratory analytical report included in Appendix E, *Laboratory and Data Validation Documents*. However, these constituents are not listed in Table 4-4. Include all detections in applicable tables in future reports. No revision is required.

Army Response: Comment noted. Army will include all validated detections in future reports.

19) NMED Approval with Modifications Comment #19:

Permittee Statement: "All VOC data were assessed to be valid since none of the 14 total results were rejected due to holding time or QC exceedances."

NMED Comment: This section is titled to provide a discussion for perchlorate analytical results. However, the Permittee discusses validity of VOC data. Resolve the discrepancy in the future reports and provide an explanation for the discrepancy in the response letter.

Army Response: Comment noted. The section and associated discussions are for perchlorate data; however, "VOC" was errantly placed in the referenced sentence instead of the word perchlorate. The Army will resolve the discrepancy in future reports.

If you have questions or require further information, please call me at (505) 721-9770.

Sincerely,

PATTERSON.M

ARK.C.1229214

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Mark Patterson

BRAC Environmental Coordinator

Fort Wingate Depot Activity

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Angela Makin

From: Angela Makin
Sent: Thursday, August 22, 2019 1:49 PM
To: 'john.kieling@state.nm.us'
Cc: dave.cobrain@state.nm.us; Ben Wear; Michiya Suzuki; 'hendrickson.charles@epa.gov'; Ian Thomas (ian.m.thomas2.civ@mail.mil); Patterson, Mark C CIV (US); 'Smith, Steve W SWF'; Alan Soicher (Alan.J.Soicher@usace.army.mil); Saqib SWF Khan (Saqib.Khan@usace.army.mil); Theel, Heather J ERDC-EL-MS; Montgomery, Cheryl R CIV USARMY CEERD-EL (US); 'Clayton Seoutewa'; 'Sharlene Begay-Platero'; 'george.padilla@bia.gov'; 'B.J Howerton'; 'Eugenia Quintana'; 'Mark Harrington'; 'Jennifer Turner'
Subject: Final Parcel 3 GW RFI Report _ Response 14June19 Approval w/Modification Ltr HWB_FWDA_18_001
Attachments: Army_GW_P3_Final_RFI_Report_Approval_w_Modificaitons_Response_Rev1_22Aug19.pdf

Mr. Kieling,

The attached letter is in reply to the June 14, 2019, reference number HWB-FWDA-18-001, regarding the Final Parcel 3 Groundwater RCRA Facility Investigation Report Approval with Modifications, Fort Wingate Depot Activity.

If you have any questions or require further information please call Mark Patterson at 505-721-9770.

The attached letter in hard copy form was sent via FedEx (Tracking # 8149 6545 6769) for delivery by 23 August 2019.

Respectfully submitted,

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