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**NEW MEXICO
ENVIRONMENT DEPARTMENT**

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James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 30, 2020

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
FINAL REVISION 1 GROUNDWATER PERIODIC MONITORING REPORT
JULY THROUGH DECEMBER 2018
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-19-004**

Dear Mr. Cushman:

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *Final Revision 1 Groundwater Periodic Monitoring Report July through December 2018* (Report), dated April 2020. NMED has reviewed the Report and hereby issues this Approval with Modifications with the attached comments. The Permittee must address all comments in the attachment to this letter and submit a response letter and replacement pages no later than **December 31, 2020**.

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
2018 Jul – Dec GW PMR
Page 2

Should you have any questions, please contact Michiya Suzuki of my staff at (505) 476-6046.

Sincerely,

Kevin Pierard

Digitally signed by Kevin
Pierard
Date: 2020.07.30 15:53:27
-06'00'

Kevin M. Pierard, Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
B. Wear, NMED HWB
M. Suzuki, NMED HWB
C. Hendrickson, EPA Region 6 (6LCRRC)
L. Rodgers, Navajo Nation
S. Begay-Platero, Navajo Nation
M. Harrington, Pueblo of Zuni
C. Seoutewa, Southwest Region BIA
G. Padilla, Navajo BIA
J. Wilson, BIA
B. Howerton, BIA
R. White, BIA
C. Esler, Sundance Consulting, Inc.

File: FWDA 2020 and Reading

Attachment

1. Discrepancy in the Permittee's Cross-reference Response Numbers to the NMED's Disapproval Comments

NMED Comment: The Permittee did not assign a cross-reference number for the Permittee's response to NMED's Comment 4. As a result, the remaining response numbers did not match with NMED's comment numbers. Ensure that each comment and response number is consistent in all future response to comment (RTC) letters.

2. Permittee's Response to NMED's Disapproval Comment 4, dated January 30, 2020

Permittee Statement: "The Army feels preparing a groundwater monitoring work plan prior to installation of the replacement wells is premature."

NMED Comment: The Permittee failed to submit the Parcel 3 groundwater monitoring plan to NMED on April 2, 2019, as required. Facility groundwater monitoring plans are required to be updated annually for any changes to the program, including addition or removal of wells from the list of active wells. Wells are routinely added to the northern area groundwater monitoring plan as they are installed, and the plan was successfully submitted and approved prior to many of the subsequently installed wells being present. Proposing to wait until all abandoned monitoring wells are replaced is not acceptable. The groundwater monitoring plan is over a year past due, and the Permittee has continued to ignore NMED direction to submit it. Failure to follow NMED constitutes noncompliance and may result in an enforcement action. Remove all statements regarding the Parcel 3 groundwater monitoring from the PMR and provide replacement pages.

3. Permittee's Response to NMED's Disapproval Comment 9, dated January 30, 2020

Permittee Statement: "The mounding suspected to be generated from well 69 leakage has prevented explosives and perchlorate migration towards the Administration Area and west of the known sources of contamination. Removal of the mound would change the flow direction of alluvial groundwater and would change the current contaminant plume shapes, likely to the west. This discussion would be best presented in a corrective measures study not a periodic monitoring report."

NMED Comment: Dissipation of the groundwater mound may expand the extent of contamination. Potential expansion of plumes must be anticipated and addressed before Well 69 is abandoned. Submit a work plan to address the potential issues associated with abandonment of Well 69. The work plan must be approved and the issue adequately addressed before Well 69 is abandoned.

4. Permittee's Response to NMED's Disapproval Comment 10, dated January 30, 2020

Permittee's Statements: "The Army believes that BGMW08 may be in a separate sandstone lens; however, the groundwater at this well originates from the same target formation, similar to existing bedrock well TMW02."

and,

"[T]he Painted Desert unit within the northern groundwater area is representative of the same depositional environment and the lithology would have the same geochemical properties. Having the same geochemical properties would allow for the evaluation of background metals concentrations, as waters reside in the same geologic formation and subsurface environment."

NMED Comment: Bedrock well TMW02 is located close to bedrock well TMW40D. According to Table 5-9, *Summary of Dissolved Metals Analytical Results*, pages 6 and 7, the concentrations of dissolved metals are not comparable in groundwater samples collected from these bedrock wells. For example, the selenium concentrations in groundwater samples collected from well TMW02 exceeded the applicable screening level of 50 µg/L in the past four sampling events, while the highest selenium concentration in groundwater samples collected from well TMW40D was recorded as 3.5 µg/L. Similarly, the manganese concentrations in groundwater samples collected from well TMW40D were recorded approximately 50 µg/L in the past four sampling events, while the highest manganese concentration in groundwater samples collected from well TMW02 was recorded as 2.9 µg/L. Even if the groundwater at wells TMW02 and TMW40 originates from the same target formation, the concentrations of dissolved metals are not comparable. The Permittee provides a justification for the use of BGMW08 as a background well because the lithology would have the same geochemical properties. However, the observation of analytical data collected from wells TMW02 and TMW40D indicate otherwise. Based on the available data, well BGMW08 must not be used as a background monitoring well.

5. Permittee's Response to NMED's Disapproval Comment 14, dated January 30, 2020

Permittee Statement: "The Army will provide a discussion in future groundwater monitoring reports and provide trend analyses for explosives concentrations at TMW03, TMW04, TMW23, and TMW40S in future groundwater monitoring reports."

NMED Comment: The *Final Groundwater Periodic Monitoring Report January through June 2019*, dated March 2020, does not provide the pertinent discussion. More specifically, provide figures (concentrations versus time) that present trends for RDX concentrations at wells TMW03, TMW04, TMW23, and TMW40S in future groundwater monitoring reports. No response required.

Kimberly Rudawsky

From: Christy Esler
Sent: Monday, August 3, 2020 2:23 PM
To: Chasitty Badonie; Kimberly Rudawsky
Cc: Angela Makin
Subject: FW: Letter to Mr. Cushman
Attachments: 2020-07-30_FWDA-19-004.pdf

Please see the attached NMED Correspondence for processing.

From: Martinez, Cynthia, NMENV <cynthia.martinez1@state.nm.us>
Sent: Monday, August 3, 2020 2:18 PM
To: george.h.cushman.civ@mail.mil
Cc: Pierard, Kevin, NMENV <Kevin.Pierard@state.nm.us>; Cobrain, Dave, NMENV <dave.cobrain@state.nm.us>; Wear, Benjamin, NMENV <Benjamin.Wear@state.nm.us>; Suzuki, Michiya, NMENV <Michiya.Suzuki@state.nm.us>; 'hendrickson.charles@epa.gov' <hendrickson.charles@epa.gov>; lasar98@yahoo.com; srbp@navajoadvantage.com; Mark.Harrington@ashiwi.org; clayton.seoutewa@bia.gov; george.padilla@bia.gov; judith.wilson@bia.gov; bj.howerton@bia.gov; 'robin.white@bia.gov' <robin.white@bia.gov>; Christy Esler <cesler@sundance-inc.net>
Subject: Letter to Mr. Cushman

Good Afternoon,
Please see attachment.

Cynthia Martinez
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Bldg.1
Santa Fe, New Mexico 87505-6313