



Michelle Lujan Grisham
Governor

Howie C. Morales
Lt. Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6313
Phone (505) 476-6000 Fax (505) 476-6030

www.env.nm.gov

CERTIFIED MAIL - RETURN RECEIPT REQUESTED



James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

September 3, 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
LETTER WORK PLAN DOWNGRADIENT ALLUVIAL AQUIFER INVESTIGATION &
INSTALLATION OF ONE ADDITIONAL WELL REVISION 1
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-18-009

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *Letter Work Plan Downgradient Alluvial Aquifer Investigation & Installation of One Additional Well Revision 1* (Work Plan), dated May 2019. NMED has reviewed the Work Plan and hereby issues this Approval with Modifications. The Permittee must address the following comments.

1. The Permittee's Response to NMED's Disapproval Comment 3

Permittee Statement: "If soil cores collected from the boring visually indicate the presence of a confining layer between two saturated zones, the proposed method of investigation that is installation of wells and observation in differences in hydrostatic head and groundwater chemistry will be followed."

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NMED Comment: The Permittee's response is appropriate; however, there is a deficiency in the proposed method. Section 5.0, *Field Methodology*, lines 17-20, page 5, states, "[t]he Army will install a shallow alluvial well in the vicinity of MW23 to determine if shallow water bearing zone exists at this location and investigate the nature and extent of detected constituents in monitoring well MW23. This well will be designated as MW36 (Figure 2)." Proposed well MW36 will be installed when the presence of two alluvial aquifers is confirmed through exploratory boring EBO1. In order to investigate the lateral and vertical extent of contamination detected in well MW23, well MW36 must be nested to screen both shallow and deep alluvial aquifers. Such wells may be designated as MW36S and MW36D. Similarly, Section 5.0, *Field Methodology*, lines 13-16, page 5, states, "[i]f both shallow and deep alluvial aquifers are distinctly present in the boring near well BWMW11, the Army will install a deeper alluvial well in the boring designated as BGMW13 (Figure 2)." A shallow alluvial well is also necessary. Accordingly, well BGMW13 must also be nested and designated as BGMW13S and BGMW13D. Revise the Work Plan to include the provision and provide a replacement page.

2. Redline Strikeout Version of the Work Plan

NMED Comment: The Permittee's Response to NMED's Disapproval Comment 4 states, "[l]ines 13-16 [sic] will be revised to include if the first step of the investigation indicates that only one aquifer exists in the vicinity, conduct original investigations as outlined in the Final Groundwater Supplemental RCRA Facility Investigation Work Plan, Revision 4, dated March 23, 2018." The referenced revision is identified in Section 5.0, *Field Methodology*, lines 5-8, page 5 in the Work Plan. However, the revision is not marked in the Redline Strikeout (RLSO) version of the Work Plan. All revisions must be marked on the RLSO version of all future revised submittals. This problem has been frequently identified by NMED and is ongoing. Failure to follow NMED direction constitutes non-compliance and may result in an enforcement action.

The Permittee must address all comments in this Approval with Modifications and submit a response letter and a replacement page no later than **January 3, 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.

Messrs. Patterson and Smith
September 3, 2019
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If you have questions regarding this letter, please contact Michiya Suzuki of my staff at 505-476-6059.

Sincerely,



John E. Kielling
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.

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