



State of New Mexico
ENVIRONMENT DEPARTMENT



Hazardous Waste Bureau

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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

April 18, 2018

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 GROUNDWATER SUPPLEMENTAL RCRA FACILITY
INVESTIGATION WORK PLAN REVISION 4
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-15-001**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *Final Groundwater Supplemental RCRA Facility Investigation Work Plan Revision 4* (Work Plan), dated March 23, 2018. NMED hereby issues this Approval with Modifications. The Permittee must address the following comments.

1. Figure 9-1, Proposed Replacement Alluvial Well MW34

NMED Comment: Although the Permittee's Response to NMED's Comment 1 of the December 21, 2017 *Disapproval letter for Final Groundwater Supplemental RCRA Facility Investigation Work Plan Revision 3* is satisfactory, Figure 9-1, *Proposed Replacement Alluvial Well MW34* still depicts the location of the well more than 80 feet west of the area where petroleum contamination was discovered. Revise Figure 9-1 to be consistent with the proposed well location shown in Figure 2-1, *Alluvial Contaminant Plumes and Proposed Alluvial Well Locations*. Provide replacement page for Figure 9-1.

2. Section 9.2, Background Monitoring Well Installation, lines 21-22, page 9-2

Permittee Statement: “BGMW11 is upgradient of sentinel wells MW23 and MW24, which have been unaffected by site activities.”

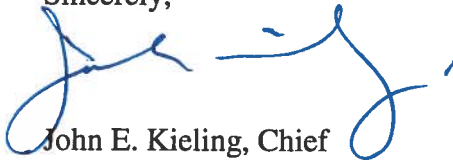
NMED Comment: Some organic contaminants related to site activities have been detected in samples obtained from well MW23 sporadically while no organic contaminants have been detected from well MW24 in recent years. Well MW23 is screened from 64 to 134 feet below ground surface (bgs) while well MW24 is screened from 16 to 66 feet bgs according to Appendix B in the *2011 and 2012 Monitoring Well Installation and Abandonment Report Version 1*, dated December 2012. The groundwater quality monitored in wells MW23 and MW24 has not been consistent according to Table 5-1 in *Groundwater Periodic Monitoring Reports*. The saturated zones were reportedly encountered at 43 and 17.6 feet bgs in wells MW23 and MW24, respectively. Two different aquifers may be present in the vicinity of the proposed well BGMW11. An abandoned well (Wingate91) was installed in a similar location to where well BGMW11 is proposed according to Figure 5 in the *Interim Facility-Wide Groundwater Monitoring Plan Version 2*, dated March 28, 2008. Well Wingate91 was installed to a depth of 113.12 feet bgs in 1963; however, the well was not likely to be screened as a monitoring well because it was installed as a water supply well. Accordingly, construction data for well Wingate91 will not likely provide data on the presence or absence of separate aquifers. Propose to investigate whether separate aquifers are present in the response letter. If both shallow and deep aquifers are distinctly present in the vicinity of proposed well BGMW11, two separate background monitoring wells must be installed.

The Permittee must address all comments contained in this Approval with Modifications in a response letter. The replacement figure addressing Comment 1 and a work plan to investigate the presence of two separate aquifers addressing Comment 2 must be submitted for NMED's review by no later than **June 17, 2018**.

Messrs. Patterson and Smith
April 18, 2018
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Should you have any questions, please contact Michiya Suzuki of my staff at (505) 476-6059.

Sincerely,



John E. Kieling, Chief
Hazardous Waste Bureau
New Mexico Environment Department

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File: FWDA 2018 and Reading, Groundwater, FWDA-15-001

