



**DEPARTMENT OF THE ARMY**  
OFFICE OF THE DEPUTY CHIEF OF STAFF, G-9  
600 ARMY PENTAGON  
WASHINGTON, DC 20310-0600

April 22, 2020

Base Realignment and Closure Division

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

RE: Final Groundwater Supplemental RFI Work Plan Revision 4, dated March 23, 2018  
Request for Work Plan Deviation Fort Wingate Depot Activity, McKinley County, New  
Mexico, EPA# NM62113820974

Dear Mr. Pierard:

This letter requests permission to deviate from field procedures for the Groundwater Supplemental Resource Conservation and Recovery Act (RCRA) Facility Investigation at Fort Wingate Depot Activity (FWDA). The field procedures for this RCRA Facility Investigation (RFI) are provided in the Work Plan titled Final Groundwater Supplemental RFI Work Plan (WP) Revision 4, dated March 23, 2018. This WP was approved by NMED on April 18, 2018. This request pertains to installation of additional wells for alluvial nitrate plume delineation. Details are provided below:

**Install Additional Alluvial Groundwater Monitoring Wells-**

As part of the RFI, new wells MW25, MW26, MW33 and MW34 were installed. The purpose of these wells was to delineate the downgradient extent of the nitrate exceeding the screening level of 10 mg/L west of the Administration Area. The initial results from these wells indicate that the screening level for nitrate (10 mg/L) was exceeded in MW25. The attached Figure 1 presents the initial results of the nitrate plume in the alluvial aquifer, showing that the nitrate plume in the alluvial aquifer has not been completely delineated in the vicinity of MW25. The Army requests installation of three additional monitoring wells (MW37, 38 and 39) to delineate the nitrate plume in the alluvial aquifer, as shown on Figure 1.

In addition, grab groundwater samples from each new monitoring well borehole will be field tested for nitrate using a Hach-DR300 Pocket Colorimeter. If nitrate is detected at a concentration greater than 5 mg/L, then the borehole will be abandoned and the well location will be moved 200 feet west of the proposed location, and the process will be repeated. All three proposed locations will follow the same procedure.

Lastly, in accordance with the NMED request dated January 22, 2020, the Army will collect soil samples at 10-foot intervals from each monitoring well location for analysis of constituents of concern.

If you have questions or require further information, please contact me at [George.h.cushman.civ@mail.mil](mailto:George.h.cushman.civ@mail.mil), 703-455-3234 (Temporary Home Office, preferred) or 703-608-2245 (Mobile).

Sincerely,

A handwritten signature in black ink that reads "George H Cushman IV". The signature is written in a cursive style with a large, stylized "V" at the end.

George H. Cushman IV  
BRAC Environmental Coordinator  
Fort Wingate Depot Activity

CC:

Dave Cobrain, NMED, HWB  
Ben Wear NMED, HWB  
Michiya Suzuki, NMED, HWB  
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