

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

April 6, 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 Periodic Monitoring Report, July through December 2018, Response to January 30, 2020 Disapproval Letter, Fort Wingate Depot Activity, McKinley County, New Mexico, EPA ID# NM6213820974, HWB-FWDA-19-004

Dear Mr. Pierard:

This letter presents the Army's responses to the New Mexico Environment Department (NMED) Disapproval letter dated January 30, 2020, regarding the Final Groundwater Periodic Monitoring Report, July through December 2018 for the Fort Wingate Depot Activity (FWDA) under RCRA Permit USEPA ID No. NM6213820974. The following are the Army's responses to comments detailing where each comment was addressed and cross-referencing the numbered NMED comments. This letter also transmits the revised report and a red-line strike-out electronic copy of the edits.

Comments

1) Inaccuracies/Discrepancies

NMED Comment: The Report contains inaccuracies and discrepancies. Examples are listed as follows:

a. Figure 5-3, Northern Area Explosives Concentrations in Alluvial Groundwater, October 2018: The RDX concentration in the groundwater sample collected from well TMW04 is recorded as 220 J ug/L. Although the RDX concentration exceeds the screening level of 9.7 ug/L, the location of the well is depicted outside of the 9.7 ug/L contour line. The well should have been depicted withing the contour line. Correct the discrepancy in the revised Report.

Army Response, Figure 5-3, Northern Area Explosives Concentrations in Alluvial Groundwater, October 2018: Concur. The RDX concentration contour line has been adjusted to include TMW04 within the plume boundary.

b. Figure 5-7, Northern Area VOC Concentrations in Alluvial Groundwater, October 2018 and Table 5-5, Summary of Volatile Organic Compound Analytical Results: The acetone concentration in the groundwater sample collected from wells were positively detected according to Appendix D, Attachment 2, *TestAmerica Laboratory Data Output*. For example, the acetone concentrations in the groundwater samples collected from wells MW18D and TMW46 are recorded as 1.2 ug/L and 1.5 ug/L, respectively in the data output. However, these detections were not recorded in the figure or the table. List all detections recorded in the laboratory data output on the tables and figures. Correct the discrepancy or provide an explanation for why these detections are disqualified and not recorded in the revised Report.

These types of errors result in extended review times for NMED. The Permittee must review all documents for accuracy prior to submittal to NMED.

Army Response: Comment noted. The acetone concentrations referenced were estimated values in the raw data from the laboratory; however, data validation of the raw laboratory results determined these acetone values to be non-detections. The final validated flag for both examples were determined to be "UJ" and are presented as such on Table 5-5 with the estimated concentration listed for each well for this sampling event (MW18D = 1.2 UJ; TMW46 = 1.5 UJ). The values presented in tables and on figures are of validated data and contain the final validation data flags. The laboratory concentration value is brought forward for consistency, but the final qualifier is attached (UJ). As these concentrations are non-detect estimated, they are not presented on the figures which present detections. No discrepancy is present in the tables or on the figures.

2) Executive Summary, lines 2-8, page ES-1, and Section 1.0, Introduction, lines 2-8, page 1-1

Permittee Statement: "This Groundwater Periodic Monitoring Report (GPMR) documents groundwater monitoring activities conducted at Fort Wingate Depot Activity (FWDA) from July 2018 through December 2018 in accordance with Interim Facility-Wide Ground Water Monitoring Plan, Version 2, Fort Wingate Depot Activity, Gallup, New Mexico (Terranear PMC, LLC, 2008) and subsequent monitoring program guidance as captured in Final 2017 Interim Facility-wide Groundwater Monitoring Plan, Version 1, Fort Wingate Depot Activity, McKinley County, New Mexico (GMP; Sundance Consulting, Inc. [Sundance], 2018b)."

NMED Comment: The last submitted Interim Facility-wide Groundwater Monitoring Plan (Version 10) was an update to the 2017 groundwater monitoring and sampling activity. The Permit requires revision and update of the Interim Plan annually to propose changes to the monitoring plan and submission of the plan for NMED review and approval. The Permittee failed to provide 2018 and 2019 updates and may be subject to an enforcement action. The Permittee must provide the 2020 update in accordance with Permit Section V.A.4.

Army Response: Comment noted. The Army will provide a 2020 update to the Groundwater Monitoring Plan.

3) Executive Summary, Lines 19-23, page ES-1

Permittee Statement: "Depth to water was measure at 67 monitoring wells and 10 piezometers during the July and October 2018 events. The groundwater sampling event for the reporting period was performed from October 8, 2018 to October 19, 2018. The groundwater samples were analyzed for targeted constituents in accordance with the GMP (Sundance, 2018b) and as listed in Table 2-2 of this GPMR."

NMED Comment: Table 2-1, *Well Construction Details*, lists the construction details of 67 wells; however, no information is provided for the piezometers. Include the construction details for the piezometers in the table in future groundwater monitoring reports.

Additionally, Table 2-2, *October 2018 Groundwater Sample Matrix*, lists 66 wells rather than 67 wells. Resolve the discrepancy in a response letter and revise the table as necessary.

Army Response, Table 2-2, October 2018 Groundwater Sample Matrix: Comment noted. The piezometers were installed by the US Geological Survey for a study separate from activities conducted under this RCRA permit. The piezometers were included in the groundwater monitoring program to supplement the alluvial groundwater elevation data. The Army will add the piezometer well construction date to Table 2-1 in future monitoring reports.

Table 2-2 is consistent with the number of wells listed in the Final 2017 Interim Facilitywide Groundwater Monitoring Plan, Version 10, Revision 1. Dry monitoring well MW18S is not listed in the monitoring work plan sample matrix since it has been a dry well since installation; but the well is nested in the same boring as MW18D and is thus listed on Table 2-1 Well Construction Details. MW18S was installed in 1994 above the alluvial water table. However, as MW18D is a critical datapoint for the nitrate and VOC plumes, MW18S has not been abandoned. A footnote has been added to Table 2-2 explaining why MW18S is not included in the groundwater sample matrix.

Executive Summary, lines 33-35, page ES-1:

Permittee Statement: "The Army will resume groundwater monitoring activities within Parcel 3 once replacement wells and additional Parcel 3 background wells have been installed following the completion of Parcel 3 hazardous operations."

NMED Comment: The work plan to install the replacement and background wells within Parcel 3 was submitted on December 20, 2018 and NMED is currently waiting to receive the payment for review. However, there are potentially more than 30 existing groundwater monitoring wells in Parcel 3 that can be sampled. There is no justification for why these two proposed wells must be installed prior to the preparation of the groundwater monitoring plan for Parcel 3. Failure to conduct work required by NMED constitutes non-compliance and may be subject to an enforcement action.

Army Response: Comment noted. The Army wants to prepare and provide an accurate monitoring work plan that includes monitoring wells that exist and that produce groundwater with sufficient volume to collect a representative sample. Also, the Army will include in the work plan the appropriate and selected sample equipment for the production rates of each new well installed. Due to the nature of the target lithology and the variable low hydraulic conductivity of the site, it cannot be determined what sample collection method would be optimal for a give location. Ideally, a dedicated low-flow pump would provide proven results at a well, but the low recharge rates that could exist at a location would prevent the low-flow technology from being effective.

The preparation of an accurate and effective groundwater monitoring work plan is dependent upon the locations that produce groundwater, the measured water column height and recharge rate of the monitoring wells. These required data are from wells that have yet to be installed. The Army feels preparing a groundwater monitoring work plan prior to installation of the replacement wells is premature.

Furthermore, of the 36 monitoring wells that have been installed in Parcel 3, there are 17 active wells, 11 abandoned wells, and 8 wells confirmed dry. Less than half of the monitoring well network can be sampled. The 11 proposed replacement wells are located within and adjacent to the HWMU, where it is critical to have representative data. The Army respectfully requests a meeting with NMED to discuss this matter and a path forward to ensure accurate monitoring and data are generated.

4) Executive Summary, lines 42-43, page ES-1, and line 1, page ES-2, Section 4.1.2, Northern Area Bedrock Groundwater System, lines 23-31, page 4-2, and Section 6.0, Summary, lines 14-16, page 6-1

Permittee Statements: "Potentiometric levels in the bedrock groundwater unit are slightly higher than in the alluvial groundwater unit and exist under hydraulically confined conditions in most of the northern area."

and,

"The groundwater potentiometric elevation in the bedrock groundwater unit is slightly higher than the groundwater elevation in the alluvial groundwater unit and is suspected to be under hydraulically confined conditions in most of the northern area. The confining unit for the bedrock groundwater unit is missing near monitoring wells TMW30 and TMW49. These are the southern-most bedrock wells in the northern area and are located north of where the water bearing sandstone crops out. Soil logs from TMW30 (USACE, 2015) and TMW49 (USACE, 2012) do not indicate the presence of a definite claystone confining layer separating the unconsolidated alluvium from the water-bearing sandstone in bedrock. Alluvial and bedrock groundwater may potentially communicate in this vicinity."

and,

"The groundwater elevation in the bedrock groundwater unit is slightly higher than in the alluvial groundwater unit and exists under hydraulically confined conditions under most of the northern area."

NMED Comment: The number of nested wells that are co-located in both bedrock and alluvial aquifers appears to be insufficient to demonstrate the accuracy of the statements. There are only three nested wells (TMW31S/D, TMW39S/D, and TMW40S/D) at the site. the alluvial groundwater elevations were higher at wells TMW31S/D and TMW39S/D and lower at well TMW40S/D in April and October 2018. It is not clear how the Permittee can conclude that the elevation of bedrock groundwater is higher than that of alluvial groundwater in most locations. Provide the data and discussion that demonstrate the accuracy of the statement or revise the statements. Revise the Report accordingly.

Army Response: Comment noted. Please note that TMW39S is approximately 25 feet away from TMW39D. TMW39S and TMW39D are not installed in the same boring like TMW31S/D and TMW40S/D are. Most of the bedrock wells in the Northern Area groundwater workshop area have a higher groundwater elevation than alluvial wells. The exceptions are background monitoring well BGMW08 and bedrock monitoring wells TMW31D and TMW39D. Excluding BGMW08, these well locations are nested (or within close proximity) with alluvial wells TMW31S and TMW39S, respectively.

Alluvial well TMW31S is 0.11-foot (1.32 inches) higher that its nested bedrock well TMW31D. Alluvial well TMW39S is 0.36-foot (4.32 inches) higher than its nested bedrock well TMW39D. Below is a list of alluvial wells located near bedrock wells and their groundwater elevations collected in October 2018. The groundwater elevation data are also presented on Figure 4-2 (alluvial, October 2018) and Figure 4-4 (bedrock, October 2018) from this Report.

Alluvial Wells	·	Bedrock Wells	5
TMW04 -	6644.08	TMW36 -	6667.61
TMW40S -	6645.54	TMW40D -	6670.05
TMW11 -	6648.85	TMW17 -	6654.79
TMW47 -	6654.58	BGMW10 -	6670.70
TMW13 -	6646.08	TMW38 -	6657.10
TMW29 -	6644.68	TMW38 -	6657.10

Of the wells listed above, the bedrock well water levels are on average 15.9 feet higher than its comparable alluvial well. These data are presented in Table 4-1 and Table 4-2, and on Figure 4-2 and Figure 4-4 of this Report. No changes to the document are warranted, as the statement is correct.

5) Executive Summary, lines 24-26, page ES-2

Permittee Statement: "The nitrate plume in the alluvial groundwater unit appears to originate from the trinitrotoluene (TNT) Leaching Beds (solid waste management unit [SWMU] 1) and extends downgradient to the Administration Area."

NMED Comment: NMED's Disapproval Comment 6, dated June 14, 2019 directed the Permittee to provide a discussion regarding the potential for a more recent release from the Administration Area that affects nitrate levels in groundwater. However, the Permittee failed to provide the discussion. Provide the discussion in the revised Report.

Army Response: Comment noted. The Army has no knowledge of any historic or recent release of nitrate from the Administration Area. The Administration Area sanitary sewer lines were active until 2014, once Building 1 ceased to be utilized. An investigation of the sewer lines was included in the Northern Area Groundwater RFI Work Plan; however, per NMED direction, this was removed from the plan. Additional monitoring wells installed during the Northern Area Groundwater RFI effort should provide additional information to determine a potential secondary source.

The following discussions have been added to the Report.

Executive Summary, lines 26-29, page ES-2: Lines now state, "The Army has no knowledge of any historic or recent release of nitrate within the Administration Area. The nitrate plume may potentially have a secondary source originating from historic sanitary sewer lines which may contribute to increasing nitrate concentrations to the west."

Section 5.2.1 Nitrate and Nitrite, lines 15-18, page 5-2: Lines now state, "The nitrate plume may potentially have a secondary source originating from historic sanitary sewer lines that may contribute to increasing nitrate concentrations to the west; however, there is no documentation of any historic or recent release of nitrate within the Administration Area."

Section 6.0 Summary, lines 31-33, page 6-1: Lines now state, "A potential secondary source from the historic sanitary sewer lines may contribute to the nitrate plume, however there is no record of any historic or recent release of nitrate within the Administration Area."

6) Section 1.2 Hydrogeologic Setting, lines 37-38, page 1-2

Permittee Statements: "They [the San Andre's limestone and Glorieta sandstone formations] are not exposed in FWDA and are no known to be contaminated by installation activities."

NMED Comment: Water supply well 69 is currently used at the Facility. The well was screened within the referenced formations; therefore, the statement is somewhat misleading. Remove or revise the statement to acknowledge that the two formations underlay the Facility and that well 69 extends into the Glorieta sandstone in the revised Report.

Army Response, Section 1.2 Hydrogeologic Setting, lines 38-39, page 1-2: Comment noted. The statement refers to the referenced units being exposed at the surface, as in outcrop. The statement earlier in the paragraph states, "The older Permian-age San Andres limestone and Glorieta sandstone formations underlie the Mesozoic Chinle Group beneath FWDA." This sentence states that these formations are underneath FWDA.

In Section 1.2, lines 38-39, page 1-2, the Army has added the following statement: "Well 69, located within the Administration Area, extends into the Glorieta sandstone and is screened within the formation. Well 69 is a flowing artesian well."

7) Section 1.2 Hydrogeologic Setting, lines 23-24, page 1-3

Permittee Statements: "The groundwater flow direction in the alluvium present in the northern portion of FWDA is predominantly southwest and west."

NMED Comment: Figure 4-1, Northern Area Alluvial Groundwater Contour Map July 2018 and Figure 4-2, Northern Area Alluvial Groundwater Contour Map October 2018, indicate that the groundwater flow direction in the alluvium is predominantly southwest and west. However, groundwater leakage from well 69 may have been affecting the Facility's natural groundwater flow direction. According to the figures, the groundwater flow direction Area (e.g. areas around the TNT Leaching

Beds) is north to northwest. Presumably, the natural alluvial groundwater flow direction is consistent with local topography toward the Rio Puerco; therefore, a northerly and northwesterly groundwater flow direction is more likely. The areas in the south of the Administration Areas may be less affected by the well 69 leakage and more representative of natural groundwater flow direction. The flow direction may significantly change once the leakage is repaired. Provide a discussion of this issue in the revised Report.

Army Response, Section 1.2 Hydrogeologic Setting, lines 25-26, page 1-3 and Section 4.1.1 Northern Area Alluvial Groundwater System, lines 5-15, page 4-2: Comment noted. See response to Comment 9. Section 1.2 discusses the general flow direction of groundwater. A discussion has been added to the Report in Section 4.1.1, page 4-2, lines 5-15. A reference to Section 4.1.1 has been added to Section 1.2, page 1-3, lines 25-26. The general statement presented in Section 1.2 lines 24-25 remains accurate per the discussion presented in Section 4.1.1.

The South Fork of the Rio Puerco, present within the FWDA, is an intermittent losing stream. Thus, groundwater does not flow to the river. Groundwater levels within the groundwater mound (MW01, MW02, MW03) are lower than measurements take at the Rio Puerco from piezometer wells. The absence of the groundwater mound would not necessarily cause a more northwestern groundwater flow towards the Rio Puerco, as it is currently introducing more water into the system but remains downgradient of the Rio Puerco and the Workshop Area. The opposite effect may occur, causing groundwater to flow more southwest towards the Workshop Area before ultimately moving west.

The areas south of the Administration Area have a northerly flow direction caused by local hill-front recharge where bedrock crops out south of the Workshop Area. This local flow direction is not readily affected by well 69 leakage, and likely will not be altered (in vicinity of the TNT leaching beds) by removal of the groundwater mound within the Administration Area.

8) Section 4.1.1 Northern Area Alluvial Groundwater System, lines 8-10, page 4-2

Permittee Statement: "The steepest gradients were found in the southeast portions of the monitoring area, and the flattest gradients were found in the central portion of the monitoring area."

NMED Comment: The area where the flattest gradients were found coincides with the area where well 69 is located. The leak from well 69 likely affects alluvial groundwater flow direction and water quality. The mounding effect potentially affects migration of explosive and perchlorate toward the Administration Area. Provide a discussion of this issue in the revised Report.

Army Response, Section 4.1.1 Northern Area Alluvial Groundwater System, lines 5-15, page 4-2: Comment noted. A discussion of potential alluvial groundwater flow changes in the event of the well 69 leakage is resolved is now present in Section 4.1.1, lines 5-15, page 4-2. Also see response to Comment 8.

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.

9) Section 4.1.2 Northern Area Bedrock Groundwater System, page 4-2

NMED Comment: The groundwater elevations in alluvial well TMW24 and bedrock well BGMW08 were recorded as 6,642.52 feet and 6,516.38 feet, respectively, during the October 2018 gauging event. The groundwater elevation in the bedrock well was more than 100 feet lower than that of the nearby alluvial well TMW24. The groundwater elevation in well BGMW08 is also notably lower than those of the rest of bedrock wells advanced in the Northern Area. Evaluate the cause of the lower groundwater elevation in well BGMW08 and provide an explanation in the revised Report. In addition, include the discussion whether the groundwater in well BGMW08 originates from the same water bearing zone in comparison to the other bedrock wells. Since well BGMW08 was installed to evaluate background groundwater conditions, the groundwater extracted from well BGMW08 must originate from the same aquifer. Discuss the appropriateness of the use of well BGMW08 as a background groundwater monitoring well.

Army Response, Section 4.1.2 Northern Area Bedrock Groundwater System, lines 30-44, page 4-2, and lines 1-3, page 4-3: Comment noted. A discussion of BGMW08 differing water level and appropriateness for including in bedrock background concentration evaluations has been added to Section 4.1.2, page 4-2, lines 30-44, and page 4-3, lines 1-3. BGMW08 does have a lower groundwater elevation than that of the other bedrock background wells installed during the same time frame. 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.

TMW02 is also believed to be in a separate sandstone layer and exhibits a different potentiometric elevation than surrounding bedrock monitoring wells. The target strata (Painted Desert unit) had a fluvial depositional environment, causing non-continuous / non-planer lenses of sands, silts, and clays. The sandstone lenses are channel deposits and would not exhibit planar bedding. The variance in water levels between BGMW08 and neighboring bedrock monitoring wells could indicate a separate sandstone lens with a different potentiometric surface; however, the 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.

10) Section 5.2.4 Volatile Organic Compounds, page 5-5

NMED Comment: The highest concentrations of 2-hexanone and benzene were detected in groundwater samples collected from bedrock background groundwater monitoring well BGMW08 during the October 2018 groundwater sampling event. Additionally, according to Table 5-5, *Summary of Volatile Organic Compound Analytical Results*, carbon disulfide and toluene were also detected from well BGMW08. These detections may be associated with boring/well advancement activity. Continue to monitor for the presence of volatile organic compounds in groundwater samples collected from

well BGMW08, evaluate the cause of the detections, and discuss the findings in future groundwater monitoring reports. If the detections are ongoing, BGMW08 cannot be used as a background monitoring well.

Army Response: Concur. The Army will continue to monitor for volatile organic compounds at BGMW08 and will evaluate whether the detections were caused by the activity associated with well installation, cross-contamination, or migration of contaminants. The Army will discuss the findings in future groundwater monitoring reports.

11) Section 5.2.5 Other Organic Compounds, lines 29-34, page 5-6

Permittee Statement: "MW23 is an alluvial well in the northwest corner of FWDA and has a dedicated Bennett pump installed. TMW31D is a bedrock well with a dedicated BESST pump in the Workshop Area. Detected concentrations of these analytes were similar in the two wells; however, field cross-contamination between monitoring wells MW23 and TMW31D is not likely because no sampling equipment was shared between these wells."

NMED Comment: The highest concentrations of 1,2,4-trichlorobenzene and 1,2dichlorobenzene were detected in groundwater samples collected from well MW23 during the October 2018 groundwater sampling event. Additionally, according to Table 5-6, *Summary of Semi-volatile Organic Compounds and Total Petroleum Hydrocarbons Analytical Results*, 1,3-dichlorobenzene, 1,4-dichlorobenzene, 2-methyl-nathpthalene and naphthalene were also detected in well MW23. These organic compounds were previously not detected in MW23. Continue to monitor for the presence of organic compounds in groundwater samples collected from well MW23. Evaluate whether the detections were caused by the activity associated with pump installation, crosscontamination, or migration of contaminants and discuss the findings in future groundwater monitoring events.

Army Response: Concur. The Army will continue to monitor for semi-volatile organic compounds it MW23 and will evaluate whether the detections were caused by the activity associated with pump installation, cross-contamination, or migration of contaminants. The Army will discuss the findings in future groundwater monitoring reports.

12) Section 5.2.5 Other Organic Compounds, lines 30-32, page 5-7

Permittee Statements: "All detections of TPH-D during the October 2018 sampling event exceeded the screening level of 0.0167 mg/L. Similarly, all detections of TPH-G also exceed the screening level of 10.1 ug/L. TPH detections are comingled with the 1,2-DCA plume."

NMED Comments: There are multiple groundwater samples that contain TPH-D and TPH-G concentrations that exceed the applicable screening levels. The extent of TPH contamination must be evaluated. Provide figures that depict iso-concentration contours for TPH-D and TPH-G in all future groundwater monitoring reports.

Army Response: Comment noted. The Army will add figures to depict TPH-D and TPH-G plume iso-concentration contours in future groundwater monitoring reports.

13) Section 5.6 New Findings, lines 1-7, page 5-11

Permittee Statement: "TMW03, TMW04, TMW23, and TMW40S are generally north and downgradient of the TNT Leaching Beds (SWMU 1). The concentration increase may be attributed to leaching of explosive compounds in soil due to seasonal precipitation and water from dust suppression infiltrating the open excavation at the TNT Leaching Beds (SWMU 1). Please note, increases (or decreases) in concentrations between two consecutive sampling events, as described here, do no establish a trend. Explosives concentrations in groundwater will continue to be monitored at FWDA."

NMED Comment: The operation associated with the TNT Leaching Beds soil excavation was complete in October 2019 and the concentrations of explosive compounds are expected to decrease gradually. The changes in RDX concentrations must be discussed in future groundwater monitoring reports. Provide plots that depict the concentrations of RDX over time for wells TMW03, TMW04, TMW23, and TMW40S in future groundwater monitoring reports.

Army Response: Concur. 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.

14) Section 6.0 Summary, lines 19-20, page 6-1

Permittee Statement: "Six groundwater contaminant plumes have been identified within the Administration Area and the Workshop Area of FWDA."

NMED Comment: Comment 13 above requires the evaluation of two additional plumes associated with TPH-D and TPH-G in the alluvial aquifer. Accordingly, a total of eight groundwater contaminant plumes must be evaluated and discussed in future groundwater monitoring reports.

Army Response: Comment noted. The Army will add TPH-D and TPH-G plumes to the six previously identified contaminant plumes in future groundwater monitoring reports.

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

Sincerely,

George H Cushman AV

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

Enclosures

CF: Dave Cobrain, NMED HWB Ben Wear, NMED HWB Michiya Suzuki, NMED, HWB Chuck Hendrickson, U.S. EPA Region 6 Ian Thomas, BRACD Steve Smith, USACE Saqib Khan, USACE SWT Cheryl Montgomery, USACE ERDC David Becker, USACE Sharlene Begay-Platero, Navajo Nation Mark Harrington, Pueblo of Zuni Clayton Seoutewa, SW BIA George Padilla, Navajo BIA B.J. Howerton, BIA Admin Record, OH/NM