

BILL RICHARDSON  
Governor

DIANE DENISH  
Lieutenant Governor

NEW MEXICO  
ENVIRONMENT DEPARTMENT

*Hazardous Waste Bureau*

2905 Rodeo Park Drive East, Building 1

Santa Fe, New Mexico 87505-6303

Phone (505) 476-6000 Fax (505) 476-6030

[www.nmenv.state.nm.us](http://www.nmenv.state.nm.us)



RON CURRY  
Secretary

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

March 2, 2010

Mark Patterson  
Ravenna Army Ammunition Plant  
Building 1037  
8451 State Route 5  
Ravenna, OH 44266

Steve Smith  
CESWF-PER-DD  
819 Taylor Street, Room 3A12  
PO Box 17300  
Fort Worth, TX 76102-0300

**RE: APPROVAL WITH MODIFICATION  
BACKGROUND STUDY AND DATA EVALUATION  
WORK PLAN (REVISED)  
FORT WINGATE DEPOT ACTIVITY  
EPA ID# NM6213820974  
FWDA-09-002**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) has received the Department of the Army's (the Permittee) *Background Study and Data Evaluation (Revised)* dated, December, 2009, (Work Plan) submitted pursuant to NMED's Second Notice of Deficiency (NOD) dated October, 2009. Based on the information provided in the Work Plan NMED hereby approves the Work Plan with the following modifications.

**Comment 1**

In Appendix J (Groundwater Sampling Results for April 2008, October 2008, and April 2009) the Permittee provided groundwater data from the last three sampling events.

In NMED's Notice of Deficiency Letter, dated August 2009, NMED stated a concern that the location of the proposed groundwater wells may not be representative of background because the

wells were impacted by site activities and appear to be down-gradient of some solid waste management units (SWMUs).

Based on the groundwater data provided in the Work Plan, several organic compounds were positively detected in the proposed wells; these organic constituents are also often associated with explosive compounds (note: that only positive detections and not "U" or "J" flagged data are included in the table below):

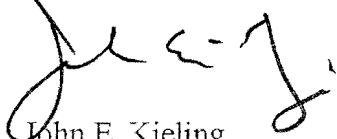
Compound	Wells with Detections (non-qualified data only)
Bromomethane	TWM-14A, TWM-19
Caprolactam	TWM-19
Chloromethane	TWM-14A, TWM-19
Carbon disulfide	TWM-14A, TWM-19, FW-31, TWM-28
Cumene	FW-3
1,3-dinitrobenzene	TWM-14A
2,4-dinitrotoluene	TWM-14A
1,4-dioxane	TWM-14A, TWM-26
2,4,6-trinitrotoluene	TWM-14A

The above data confirm that some of the proposed monitoring wells, specifically TWM-14A and TWM-19, are not appropriate as background reference wells, as data indicate potential impacts due to site activities. The Permittee may not use these two wells as background wells.

No revisions to the Work Plan are necessary; however, the Permittee must ensure that all modifications included in this letter are incorporated into the Scope of Work and are discussed in the Report. The Permittee must submit a Report summarizing the results of implementation of the Work Plan to NMED on or before July 30, 2010. Additionally, the Permittee must notify NMED 30 calendar days prior to the implementation of any field activities.

If you have any questions regarding this letter, please contact Tammy Diaz-Martinez at (505) 476-6056.

Sincerely,



John E. Kieling  
Manager  
Permits Management Program  
Hazardous Waste Bureau

Messrs. Patterson and Smith  
March 2, 2010  
Page 3

cc: Tammy Diaz-Martinez, NMED HWB  
Dave Cobrain, NMED HWB  
J. Kieling, NMED HWB  
Laurie King, U.S EPA Region 6  
Chuck Hendrickson, U.S. EPA Region 6  
Sharlene Begay-Platero, Navajo Nation  
Eugenia Quintana, Navajo Nation  
Rose Duwyenie, BIA  
Steve Beran, Zuni Pueblo  
Edward Wemytewa, Zuni Pueblo  
Marisa Yuselew, Zuni Pueblo  
Clayton Seoutewa, Southwest Region BIA  
Charles Long, Navajo Nation  
Ben Burshia, BIA  
Eldine Stevens, BIA  
Judith Wilson, BIA  
David Henry, USACE  
Richard Cruz, Fort Wingate

File: FWDA 2010 & Reading File  
FWDA-09-002