



BILL RICHARDSON
Governor

DIANE DEMISH
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



RON CURRY
Secretary

SARAH COTTRELL
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 9, 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 DIRECTION
FWDA FACILITY-WIDE GROUNDWATER MONITORING
PERIODIC REPORT FOR APRIL 2009 TO JULY 2009
FORT WINGATE DEPOT ACTIVITY, EPA ID # NM6213820974
FWDA-10-003**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) has completed its review of the U.S. Department of the Army's (the Permittee) *Fort Wingate Depot Activity (FWDA) Facility-Wide Ground Water Periodic Monitoring Report for April 2009 to July 2009*, (Report) dated January, 2010. This submittal is a requirement of Section V.A.2 of the *Fort Wingate Depot Activity RCRA Permit* (RCRA Permit). NMED hereby approves this Report with the following direction.

COMMENT 1

In Table 4-1 (Northern Area Groundwater Measurements, Alluvial Monitoring Wells), the Permittee provided depth to water (DTW) measurements for each well sampled. There are significant variations in the DTW measurements reported for monitoring well EMW04. The Permittee must provide a discussion of this variation in the next groundwater monitoring report submittal.

COMMENT 2

In Section 7, the Permittee recommends that the analytical list required for groundwater samples be reduced. NMED provided a response to this request in the Approval with Modifications Letter for the Interim Facility Wide Groundwater Monitoring Plan, dated April 28, 2010 (Comment 1). The Permittee must adhere to NMED's approved monitoring plan response.

COMMENT 3

In Section 7.2 (Well Abandonment), the Permittee proposes to abandon monitoring wells FW07, FW08, FW11, FW12, FW13, FW26, and FW27 due to lack of water and very slow recharge. NMED approves the proposed abandonment.

The Permittee also proposes to abandon CMW 16 and CMW06. As stated in NMED's Approval with Modification Letter, dated February 16, 2009, NMED concurred that these wells should be abandoned. The Permittee may abandon wells CMW16 and CMW06.

The Permittee proposes to abandon wells TMW05 and FW10 due to insufficient groundwater. Given that perchlorate was detected at relatively high concentrations in the past the Permittee proposes replacing the wells. As stated in NMED's Approval with Direction Letter, dated February 16, 2009, "Since CMW 16 and CMW06 were not located, the Permittee may exclude them from future sampling events. The Permittee must revise the Work Plan to incorporate the removal of the CMW 16 and CMW06 wells."

The Permittee must submit a work plan to NMED for approval proposing to abandon and/or replacement of wells. In the work plan the Permittee must describe the proposed methods for well abandonment or replacement. The Work Plan must be submitted to NMED no later than October 29, 2010.

COMMENT 4

In Section 7.2 (Well Abandonment) the Permittee proposes to remove monitoring well MW18S from the monitoring and sampling program because the well has been dry during the previous seven quarters of sampling. The Permittee may remove this well from the sampling program; however, during sampling of the MW18D well the Permittee must check for water in MW18S and if the well does contain water, the Permittee must include the information in the corresponding monitoring report submitted to NMED.

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COMMENT 5

The Permittee must propose to install two additional monitoring wells in the northwest part of the facility (see Attachment for the approximate locations) the wells must be screened in the same sandstone unit(s) intersected by the new wells installed at Parcel 22 north of the 528 Complex. The Permittee must include the proposed monitoring well installations in the same work plan that proposes well abandonment and replacement (See Comment 3)

As specified in Comment 3, the Permittee must submit the work plan to NMED that includes the proposed well installation and abandonment no later than October 29, 2010.

If you have questions regarding this approval please contact Tammy Diaz of my staff at 505-476-6056.

Sincerely,



John E. Kieling
Program Manager
Permits Management Program
Hazardous Waste Bureau

cc:

Dave Cobrain NMED HWB
Tammy Diaz-Martinez, NMED HWB
Laurie King, U.S EPA Region 6 (6PD-N)
Charles Hendrickson, U.S. EPA Region 6
Sharlene Begay-Platero, Navajo Nation
Eugenia Quintana, Navajo Nation
Edward Wemytewa, Pueblo of Zuni
Steve Beran, Pueblo of Zuni
Clayton Seoutewa, BIA
Rose Duwyenie, BIA
Link Lacewell, DOI/BLM
Judith Wilson, BIA
Edline Stevens, BIA
Ben Burshia, BIA

File: FWDA 2010 & Reading File
HWB-FWDA-10-003

