



DEPARTMENT OF THE ARMY
FORT WINGATE DEPOT ACTIVITY
P.O. BOX 268
FORT WINGATE, NM 87316

January 7, 2011

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

Dear Mr. Bearzi:

The purpose of this letter is to submit a revision to the October 2009 through January 2010 Facility-Wide Ground Water Periodic Monitoring Report. The enclosures include applicable replacement pages, Tables and Figures for Section 4.0. Section 4.0 text, figures and tables were edited to address comments made by New Mexico Environment Department (NMED) – Hazardous Waste Bureau (HWB) during the review of this report. An additional subsection was added in Section 4.0 to explain our current understanding of groundwater elevation deviations noted in monitoring well EMW04. Included with the enclosures are two Compact Disks (CD). One CD contains the entire revised report (Version 2), and the other contains a redline-strikeout text version. The Albuquerque U.S Army Corps of Engineers District will send all enclosures to you under separate cover.

Below are the responses to comments made by NMED-HWB during the review of the October 2009 through January 2010 Facility-Wide Groundwater Periodic Monitoring Report.

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 between the DTW measurements reported for monitoring well EMW04 in this report and those reported in the *Facility-Wide Ground Water Periodic Monitoring Report for April 2009 to July 2009*, dated January 2010. NMED's June 9, 2010, Approval with Direction required the Permittee to provide a discussion for the variation in subsequent groundwater reports. NMED reiterates that the Permittee must revise the Report to include a discussion on the DTW variations observed in well EMW04 over the past four monitoring events.

Response 1:

A new subsection was added to Section 4.0 and 4.3, that discusses the current understanding of monitoring wells installed around the Eastern Landfill. A redlined version of subsection 4.3 can be found on the redline-strikeout text version CD.

Comment 2:

In Section 4 (Groundwater Monitoring Results), the Permittee includes various groundwater contour maps; however, a number of the maps do not provide information consistent with the data provided in Table 4-1 (Northern Area Alluvial Ground Water Elevation). For example, Figure 4-1 (October 2009 Northern Area Alluvium Ground

Water Contour Map) shows that FW29 has a water level elevation of 6642.52; however, the 6645 foot groundwater contour line runs through the well location. In addition, well FW29 is not included in Table 4-1. TWM06, TMW07, and TMW23 have groundwater elevations in the 6642 foot range; however, the 6642 foot contour line does not intersect the well locations. In Figure 4-2 (January 2010 Northern Area Alluvium Ground Water Contour Map), the elevation contour lines are not consistent with the groundwater elevations listed for FW29, TMW31 S, SMW01, MW01 and TMW13. In Figure 4-3 (January 2010 Northern Area Bedrock Groundwater Contour Map), contour lines do not correspond to the elevations listed for TMW36, TMW02, and TMW16. The Permittee must revise the Report to include contour maps that are consistent with groundwater elevations as well as tables that include all wells that are shown on the maps.

Response 2:

USACE concurs with NMED's comment and has revised these maps. Revised maps are included in Version 2. A redline-strikeout version of the original maps is not provided. However, Tables 4-1 and 4-3 contained errors, which lead to at least one of the errors noted in Figures 4-1 and 4-2. Corrections made to these Tables are denoted in redline-strikeout style edits and can be viewed on the CD containing the redline-strikeout version.

Comment 3:

In Section 7.0 (Recommendations) the Permittee states "[m]onitoring wells CMW20 and CMW21 can no longer be used for collecting groundwater samples. Flooding during the summer of 2009 buried CMW 21 beneath sediment. This monitoring well should be abandoned while its location is still known. Flooding has damaged CMW20." While NMED concurs with the abandonment of monitoring wells CMW20 and CMW21, the Permittee may be required to install new wells near this location, depending on the results of future groundwater monitoring. The Permittee must submit a work plan to NMED proposing to abandon these wells and that describes the proposed methods for well abandonment (or replacement). The Permittee must comply with 19.27.4 NMAC.

Response 3:

The abandonment of non-functional monitoring wells located in the OB/OD area will be abandoned as part of the OB/OD Area Removal Work Plan. Additionally, USACE submitted a monitoring well installation and abandonment proposal in December 2010. The proposal identifies monitoring wells in the Northern Area of the installation that

require abandonment. It also states that the OB/OD monitoring wells will be included in the OB/OD Removal Work Plan.

Comment 4:

In Section 7.0 (Recommendations) the Permittee states "[a]ppendix F contains a proposed sampling plan based on non-detected constituents for four sampling events over a two year period." The Permittee also proposes to remove constituents from the sampling and analyses plan where results have repeatedly been non-detect for four consecutive sampling events. NMED concurs with the sampling plan provided in Appendix F. However, based on future sampling results the Permittee may be required to modify the sampling plan or install new monitoring wells. No revisions to the Report are necessary. The Permittee has been submitting groundwater monitoring reports for each event shortly before the next sampling event, which does not allow NMED enough time to provide input prior to the next sampling event. Beginning with the 2011 sampling event the Permittee must therefore submit all Facility Wide Groundwater Monitoring Reports within 60 days after the sampling and monitoring has been completed. The Permittee must address all comments contained in this letter and submit a revised Report. The Permittee must include a cover page with the revised document that indicates that the submittal is a revision and was prepared for NMED. The revised document must be accompanied with a response letter that details where all revisions have been made, cross referencing NMED's numbered comments. The Permittee must also submit an electronic copy of the revised document with all edits and modifications shown in redline-strikeout format. The revised Report must be submitted to NMED no later than December 30, 2010.

Response: 4:

This comment was addressed with the submittal of the April 2010 through July 2010 Groundwater Periodic Monitoring Report.

If you have questions or require further information, please call me at (330) 358-7312.

Sincerely,

A handwritten signature in black ink that reads "Mark Patterson" with a stylized flourish at the end.

Mark Patterson
BRAC Environmental Coordinator

Enclosures

CF:

Dave Cobrain, NMED, HWB

Shannon Duran, NMED, HWB

Richard Cruz, Fort Wingate

Chuck Hendrickson, U.S. EPA Region 6

Sharlene Begay-Platero, Navajo Nation

Eugenia Quintana, Navajo EPA

Rose Duwyenie, Navajo BIA

Steve Beran, Pueblo of Zuni

Edward Wemytewa, Pueblo of Zuni

Marisa Yuselew, Pueblo of Zuni

Clayton Seoutewa, SW BIA

Charles Long, Navajo Council

Bill O'Donnell, ACSIM

Mike Kipp, USAEC

Steven Smith, USACE

Christy Esler, U.S. Army

Eldine Stevens

Judith Wilson

Media

2 hard copies, 2 Report CDs,
2 Redline-Strikeout Text CDs included,
with Bearzi

See above

2 Hard Copy, 2 Report CDs

1 Hard Copy, 1 Report CDs

1 Hard Copy, 7 Report CDs

1 Report CD

1 Hard Copy, 2 Report CDs

1 Report CD

1 Hard Copy, 8 Report CDs

Included with Edward Wemytewa

1 Hard Copy, Report 1 CD

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