



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

December 17, 2020

Base Realignment and Closure Operations Branch

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: Approval with Modifications, Final Revision 1, Parcel 3 Groundwater Background Wells and Replacement Monitoring Wells Installation Work Plan, Fort Wingate Depot Activity, McKinley County, New Mexico, EPA ID#NM6213820974, HWB-FWDA-19-005

Dear Mr. Pierard:

This letter presents the Army's responses to the New Mexico Environment Department (NMED) Approval with Modification letter dated November 20, 2020, regarding the Final Revision 1 Parcel 3 Groundwater Background Wells and Replacement Monitoring Wells Installation Work Plan 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 required replacement pages and a red-line strike-out electronic copy of the edits.

Comments

1) Permittee's Response to NMED's Disapproval Comment 1, dated February 5, 2020

Permittee Statement: "The Army respectfully requests to proceed to install the well as proposed in this Work Plan."

NMED Comment: The Permittee investigated accessibility in the vicinity of the arroyo approximately 1,500 feet east of well BGMW05 and found that the location was not accessible. Accordingly, the proposed location approximately 2,500 feet northeast of well BGMW05 is hereby approved. The Permittee may proceed to install the well at the proposed location. No response required.

Army Response: Concur. Army will proceed to install the replacement well at the proposed location.

2) Permittee's Response to NMED's Disapproval Comment 2, dated February 5, 2020

Permittee Statement: "The Army has attached the approved plugging plan of operations and the NMOSE approval letters to this letter."

NMED Comment: Attachment 1, New Mexico Office of the State Engineer Approval Letters, Well Plugging Plan of Operations included the approved plugging plans for wells FW38, CMW06, CMW07, CMW10, CMW14, CMW17, CMW18, CMW19, CMW20, and CMW21; however, did not include a plan for CMW33B. Instead, an approved plan for well G-191 was included. NMED's Disapproval Comment 2 requires submission of the approved plan for CMW33B, as well. Clarify whether well G-191 refers to well CMW33B in a response letter. If so, explain why the designation of the well was changed in the response letter.

Army Response: Comment noted. The Army provided backup in the previous submission that G-191 POD 36 is actually monitoring well CMW33B. The group of wells submitted during the 2017 RFI field work were labeled as "G-191" by NMOSE. Well CMW33B was named POD 36 in their records, as shown on the CMW33B backup page 2 from the previous submission. The backup provided is the permit to drill monitoring wells, which shows the group and the POD location, cross referenced with the monitoring well names. Page 2, where POD 36 is circled in red, is bookmarked as "G-191 POD 36 is CMW33B backup, page 2". When the plugging plan of operations was filed and approved, NMOSE used the group and the POD number on the plan approval as referenced in their system. Please contact us if there are additional questions regarding the cross-referencing of CMW33B with G-191 POD 36. The Approved plugging plan and the backup are attached to this letter for ease of review. Please note the Army previously submitted the plugging plan for CMW33B to Mr. Ben Wear via e-mail on September 7, 2018, per NMED's request following the Army's notice to abandon the well.

3) Permittee's Response to NMED's Disapproval Comment 2, dated February 5, 2020

Permittee Statement: "For Clarification, monitoring well CMW19 was abandoned due to damage incurred during flooding in Parcel 3."

NMED Comment: The plan was approved in May 21, 2019; therefore, the flooding event presumably occurred prior to the date but not too long ago. Provide an approximate date when the flooding event occurred. Under such circumstances, the Permittee must report the conditions of monitoring wells to NMED and propose to abandon them, if appropriate, in the future.

Army Response: Concur. The Army will report conditions of monitoring wells and propose to abandon, if needed, when identified. As active UXO work was ongoing in Parcel 3, no routine groundwater well inspections were being performed. The Damage to well CMW19 was noticed during a site walk to

inspect CMW10 for potential abandonment due to proximity to excavation activities. During that site walk, it was noticed that CMW19, located within the main arroyo adjacent to the HWMU north gate, had well pad and stickup damage. It is likely that flooding within the arroyo occurred between the fall of 2018 and January of 2019.

4) Permittee's Response to NMED's Disapproval Comment 6, dated February 5, 2020

Permittee Statement: "The Army added a provision that efforts to achieve the installation of productive groundwater monitoring wells will be attempted; however, given the extensive soil excavation and rework in the area, and the proven lack of overall groundwater within Parcel 3, the Army cannot ensure every proposed well will produce sufficient groundwater."

NMED Comment: The Permittee's response to NMED's Disapproval Comment 7 states, "[t]he Army added a provision to install temporary monitoring wells in the event a saturated zone within the planned depth of the boring is not encountered." The provision should ensure that every well installed at the site produces groundwater. Additionally, NMED's Disapproval Comment 7 requires the Permittee to contact NMED to discuss alternative locations if water is not produced from temporary wells. Section 3.4, where NMED's Disapproval Comments 6 and 7 were addressed, does not include the provision to contact NMED to discuss alternative locations. Include the provision in the appropriate replacement pages for the Work Plan.

Army Response, Section 3.4, page 3-3, lines 4-6 and lines 19-21: Concur.

The following provision was added to Section 3.4, page 3-3 stating "In the event a temporary well does not produce water, or the location is determined to not be water bearing, the Army will contact and coordinate with NMED to discuss alternative locations."

This provision was applied to both, background well locations and to replacement well locations, within this section.

5) Section 3.4.2, Subsurface Soil Sampling, lines 39-41, page 3-4

Permittee Statement: "Soil samples will be collected at three intervals at each boring. One sample will be collected within the first 3 feet from ground surface, one from the saturated zone, and the final sample collected at the borehole termination depth."

NMED Comment: Explain the basis for collecting soil samples within the first three feet from ground surface in the response letter. Soil contamination may likely be detected near ground surface (e.g., within six inches from ground surface). Revise the proposed sampling depth to propose to collect samples within six inches of the ground surface and provide replacement pages.

Army Response, Section 3.4.2, page 3-5, lines 3-4: Concur. The text has been edited to read: "One sample will be collected within the first six inches from ground surface, one from the saturated zone, and the final sample collected at the borehole termination depth."

The initial proposed depth was to collect the first sample and have it representative of the boring, not of surface soil. The Army will collect the first soil sample within the first six inches of ground surface as requested.

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

Sincerely,



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

Enclosures

CF:

Dave Cobrain, NMED HWB
Ben Wear, NMED HWB
Michiya Suzuki, NMED HWB
Charles Hendrickson, USEPA
Ian Thomas, BRAC
George Cushman, BRAC BEC
Steve Smith, USACE
Saqib Khan, USACE SWT
Sharlene Begay-Platero, Navajo Nation
Mark Harrington, Pueblo of Zuni
Clayton Seoutewa, SW BIA
Alvin Whitehair, SW BIA
George Padilla, Navajo BIA
B.J. Howerton, BIA
Admin Record, OH/NM

Kimberly Rudawsky

From: Christy Esler
Sent: Friday, December 18, 2020 6:31 AM
To: kevin.pierard@state.nm.us; dave.cobrain@state.nm.us; Ben Wear; Michiya Suzuki; Ian Thomas (ian.m.thomas2.civ@mail.mil); Cushman, George H IV CIV USARMY HQDA DCS G-9 (USA); Smith, Steven W CIV USARMY CESWF (US); Chuck Hendrickson (hendrickson.charles@epa.gov); Khan, Mohammad Saqib (Saqib) CIV USARMY CESWF (USA; Gallegos, Santiago M CIV USARMY CESPA (USA); Sharlene Begay-Platero; Mark Harrington; Seoutewa, Clayton; Whitehair, Alvin; george.padilla@bia.gov; B.J Howerton
Subject: Approval with Modifications, Final Rev. 1, Parcel 3 Groundwater Background Wells and Replacement Monitoring Wells Installation Work Plan, Fort Wingate Depot Activity
Attachments: AwM Final Rev1 Parcel 3 GW Background Wells_Replacement MW Installation WP_17Dec2020.pdf

Mr. Pierard,

The attached letter presents the Army's responses to the New Mexico Environment Department Approval with Modification letter dated November 20, 2020, regarding the Final Rev. 1, Parcel 3 Groundwater Background Wells and Replacement Monitoring Wells Installation Work Plan, Fort Wingate Depot Activity.

If you have questions or require further information, please contact George Cushman IV at George.h.cushman.civ@mail.mil, 703-456-3234 (Temporary Home Office, preferred) or 703-608-2245 (Mobile).

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Sundance Consulting, Inc., under contract with the U.S Army Corps of Engineers, is respectfully submitting the attached letter on behalf of the Army.

Thank you,

Christy Esler | Program Manager

Sundance Consulting, Inc.

Woman-Native American-Owned Small Business

4292 Tallmadge Rd. | Rootstown, OH. 44272

330-578-3024 Office | 330-727-0042 Mobile

330-358-7311 (U.S Army Office | Fort Wingate Army Depot)

cesler@sundance-inc.net

www.sundance-inc.net

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Sunday, 12/20/2020			
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