



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

February 16, 2021

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: Second Response, Approval with Modifications, Response to Approval with Modifications, Final Revision 1 Groundwater Periodic Monitoring Report, July Through December 2018, 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) Approval with Modification letter dated November 05, 2020, regarding the Approval with Modifications, Response to Approval with Modifications, Final Revision 1 Groundwater Periodic Monitoring Report, July Through December 2018, for the Fort Wingate Depot Activity (FWDA), under RCRA Permit USEPA ID No. NM6213820974. This letter also transmits groundwater data tables and an electronic database in response to comment 1, which contains analytical results collected from southern area groundwater (Parcel 3) during April and July 2018.

**Comments**

**1) Permittee's Response to NMED's Approval with Modifications Comment 2, dated September 21, 2020**

**NMED Comment:** The Permittee installed new groundwater monitoring wells in Parcel 3 under a work plan approved by NMED in 2016. Any approvals regarding groundwater monitoring in Parcel 3 prior to that time period are not relevant. The Permittee then sampled the wells without an approved monitoring work plan from NMED. On October 17, 2018, the Permittee was directed to provide a periodic monitoring report for groundwater samples collected in 2018, as well as provide a groundwater monitoring work plan for the area. The Permittee failed to submit the required documents and was subsequently issued a Notice of Violation on June 20, 2019. The Permittee continues to present the same arguments that were not accepted by NMED. The Permittee is in violation of their Permit and is subject to enforcement.

**Army Response:** Comment Noted: Please note that the Army's response to NMED's approval with modifications comment 2, dated September 21, 2020, originated from NMED's comment 4 dated January 30, 2020, concerning preparation of a Parcel 3 groundwater monitoring work plan.

Regarding the requested southern area monitoring report, the Army did not submit the data because they had been collected without a work plan, and based on previous

NMED responses to other site deliverables at FWDA, the Army did not believe that either the data collected or the report for these data would have been admissible or approved. As an interim measure, the Army is now respectfully submitting both data tables and an electronic searchable database for the groundwater samples collected in 2018 for NMED's files. The Army will also present these data in the first southern area monitoring report, in addition to the proposed eight (8) quarterly sampling events.

The Army is in receipt of NMED's approval, dated January 29, 2021, of the Final Revision 1, Parcel 3 Groundwater Background Wells and Replacement Monitoring Wells Installation Work Plan, and is currently securing funds to contract and perform the monitoring well installation. The abbreviated groundwater monitoring plan will be developed for NMED's approval following the installation of the additional monitoring wells, per the approved work plan.

**2) Permittee's Response to NMED's Approval with Modifications Comment 3, dated July 30, 2020**

**Permittee Statement:** "The Army will submit a well abandonment plan for Well 69 for review and approval to NMOSE. Copies of the approved work plan will be submitted to NMED for NMED's administrative records."

**NMED Comment:** In a response letter, propose the date for submittal of the well abandonment plan for Well 69 to the New Mexico Office of the State Engineer (NMOSE).

**Army Response:** Concur. The Army plans to provide an abandonment work plan to NMOSE in the second quarter of 2021. This timeline allows the performing subcontractor to be placed under contract and to prepare the abandonment work plan. As Well 69 is under artesian pressure and extends into the regional aquifer, the Army is taking extreme care in selecting the subcontractor that can successfully perform the well abandonment.

**3) Permittee's Response to NMED's Approval with Modifications Comment 4, dated July 30, 2020**

**Permittee Statements:** "The Army would like to propose abandoning TMW02, as it is being influenced locally by alluvial groundwater as explained below. Other bedrock wells have been installed during the Northern Area Groundwater monitoring adjacent to TMW02 and would provide coverage in monitoring groundwater conditions. The Army also proposes to abandon BGMW08 as a background well due to low recharge rates."

and,

"Alluvial wells and TMW02 show elevated and similar concentration levels of selenium compared to near bedrock wells. TMW02 is likely measuring a mixture of both alluvial and bedrock groundwater quality."

**NMED Comment:** Attachment 2, Selenium Concentrations from TMW02 Compared to Adjacent Alluvial and Bedrock Groundwater Concentrations, Last Seven Monitoring Events, demonstrates that the groundwater collected from well TMW02 represents

alluvial groundwater quality rather than a mixture of both alluvial and bedrock groundwater quality. Therefore, it is more appropriate to retain well TMW02 as an alluvial groundwater monitoring well and continue to monitor groundwater quality. Designate well TMW02 as an alluvial well in future submittals, as appropriate.

Low level detections of perchlorate in the groundwater samples collected from well BGMW08 were previously reported. Since the groundwater flow direction in the bedrock aquifer at the site is not completely understood, these detections may indicate the leading edge of the perchlorate plume. Therefore, retain well BGMW08 as a bedrock groundwater monitoring well and continue to monitor groundwater quality. Designate well BGMW08 as a bedrock monitoring well rather than a background monitoring well in future submittals.

**Army Response:** Comment acknowledged. The Army agrees that TMW02 better aligns with surrounding alluvial aquifer wells; however, the soil boring log for TMW02 shows the screen and filter pack extending into bedrock. TMW02 has a probability to be a conduit between the alluvial and bedrock aquifers. There are several wells within the vicinity of TMW02 that would provide coverage if TMW02 is abandoned. The Army is also proposing to install two additional wells to replace TMW40S and TMW40D to ensure well network coverage.

Concerning BGMW08, only trace estimated detections of perchlorate were reported in 2018; both were estimated values below the method LOD at 0.0095 µg/L and 0.0076 µg/L. Since then, there have been no detection of perchlorate in BGMW08 during the April 2019, October 2019, and April 2020 periodic monitoring events. The Army does not concur that these early, low level detections could be evidence of a leading edge of the perchlorate plume. The distance between BGMW08 and the source area is over 5000 feet. BGMW09 and BGMW10 are located between BGMW08 to the north and the perchlorate source area to the south, and both have been non-detect for perchlorate over all sampling events.

Army is requesting concurrence in installing a new bedrock background monitoring well in the vicinity of BGMW08, and is again proposing to decommission and replace BGMW08 due to consistent high turbidity, high matrix interference, and lack of water. Additionally, the very low recharge rate of BGMW08 does not produce sufficient volume to support collecting the analytical suite required by the monitoring program.

If you have questions or require further information, please contact me at [George.h.cushman.civ@mail.mil](mailto: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

George Cushman, FWDA BEC

Steve Smith, USACE

Saqib Khan, USACE SWT

Sharlene Begay-Platero, Navajo Nation

Mark Harrington, Pueblo of Zuni

Alvin Whitehair, SW BIA

George Padilla, Navajo BIA

B.J. Howerton, BIA

Admin Record, OH/NM

## Kimberly Rudawsky

---

**From:** Christy Esler  
**Sent:** Tuesday, February 16, 2021 1:35 PM  
**To:** kevin.pierard@state.nm.us; dave.cobrain@state.nm.us; Ben Wear; Michiya Suzuki; Cushman, George H IV CIV USARMY HQDA DCS G-9 (USA); Smith, Steven W CIV USARMY CESWF (USA); Khan, Mohammad Saqib (Saqib) CIV USARMY CESWF (USA); Sharlene Begay-Platero; Mark Harrington; Whitehair, Alvin; george.padilla@bia.gov; B.J Howerton  
**Subject:** Final Re Groundwater PMR July-Dec 2018, AwM Second Response Letter, Fort Wingate Depot Activity  
**Attachments:** Final Rev 1\_GWPMR\_Jul\_Dec 2018\_AwM\_Second Response Ltr\_16Feb2021.pdf

Mr. Pierard,

The attached letter presents the Army's responses to the New Mexico Environment Department Approval with Modification letter dated November 5, 2020, regarding the Approval with Modifications, Final Revision 1 Groundwater Periodic Monitoring Report, July through December, 2018, for the Fort Wingate Depot Activity.

FedEx Tracking Number- 8132 1176 9945

If you have questions or require further information, please contact George H. Cushman at [George.h.cushman.civ@mail.mil](mailto:George.h.cushman.civ@mail.mil), 703-455-3234 (Temporary home office, preferred) or 703-608-2245 (Mobile).

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](mailto:cesler@sundance-inc.net)

[www.sundance-inc.net](http://www.sundance-inc.net)

**CONFIDENTIALITY NOTICE:**

*This message (including any attachments or enclosures) contains information that may be confidential and is intended only for the use of the individual or entity named above. If you have received this communication in error, please immediately notify me by return email and destroy the communication.*

FedEx Tracking Number **8132 1176 9945**

Form ID No. **0200**

Sender's Copy

**1 From** Please print and press hard.  
Date **17 Feb 2021** Sender's FedEx Account Number **7895-5455-2**

Sender's Name **George Cushman** Phone **(817) 986-1857**

Company **US Army Corps of Engineers**

Address **819 Taylor St** Dept./Floor/Suite/Room

City **Fort Worth** State **TX** ZIP **76102-6124**

**2 Your Internal Billing Reference** First 24 characters will appear on invoice. **GWPMR July-Dec 2018 Response**

**3 To** Recipient's Name **Mr. Kevin Pierard** Phone **(505) 476-6000**

Company **NMED - HWB Chief**

Address **2905 Rodeo Park Dr. E Bldg 1** Dept./Floor/Suite/Room  
We cannot deliver to P.O. boxes or P.O. ZIP codes.

Address Use this line for the HOLD location address or for continuation of your shipping address.

City **Santa Fe** State **NM** ZIP **87505-6313**

Hold Weekday  
FedEx location address  
REQUIRED. NOT available for  
FedEx First Overnight.

Hold Saturday  
FedEx location address  
REQUIRED. Available ONLY for  
FedEx Priority Overnight and  
FedEx 2Day to select locations.

**4 Express Package Service** \* To most locations. Packages up to 150 lbs. For packages over 100 lbs., use the FedEx Express Freight US Airbill.

Next Business Day	2 or 3 Business Days
<input type="checkbox"/> FedEx First Overnight Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless Saturday Delivery is selected.	<input type="checkbox"/> FedEx 2Day A.M. Second business morning.* Saturday Delivery NOT available.
<input type="checkbox"/> FedEx Priority Overnight Next business morning.* Friday shipments will be delivered on Monday unless Saturday Delivery is selected.	<input checked="" type="checkbox"/> FedEx 2Day Second business afternoon.* Thursday shipments will be delivered on Monday unless Saturday Delivery is selected.
<input type="checkbox"/> FedEx Standard Overnight Next business afternoon.* Saturday Delivery NOT available.	<input type="checkbox"/> FedEx Express Saver Third business day.* Saturday Delivery NOT available.

**5 Packaging** \* Declared value limit \$500.

FedEx Envelope\*  FedEx Pak\*  FedEx Box  FedEx Tube  Other

**6 Special Handling and Delivery Signature Options** Fees may apply. See the FedEx Service Guide.

Saturday Delivery  
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

No Signature Required  
Packages may be left without obtaining a signature for delivery.

Direct Signature  
Someone at recipient's address may sign for delivery.

Indirect Signature  
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only.

**Does this shipment contain dangerous goods?** One box must be checked.

No  Yes As per attached Shipper's Declaration.  Yes Shipper's Declaration not required.  Dry Ice Dry Ice, 9 UN 1845 \_\_\_\_\_ x \_\_\_\_\_ kg

Restrictions apply for dangerous goods — see the current FedEx Service Guide.  Cargo Aircraft Only

**7 Payment Bill to:** Enter FedEx Acct. No. or Credit Card No. below.

Sender Acct. No. in Section 1 will be billed.  Recipient  Third Party  Credit Card  Cash/Check

FedEx Acct. No. \_\_\_\_\_ Exp. Date \_\_\_\_\_  
Credit Card No. \_\_\_\_\_

Total Packages **1** Total Weight **802.** lbs. Total Declared Value\* **644**

\*Our liability is limited to US\$100 unless you declare a higher value. See back for details. By using this airbill you agree to the service conditions on the back of this airbill and in the current FedEx Service Guide, including terms that limit our liability.  
Rev. Date 2/18 • Part #167682 • ©2012-2018 FedEx • PRINTED IN U.S.A. RRDA 00/00



PULL AND RETAIN THIS COPY BEFORE AFFIXING TO THE PACKAGE. NO POUCH NEEDED.



TRACK ANOTHER SHIPMENT

813211769945



ADD NICKNAME

Delivered  
Friday, February 19, 2021 at 1:23 pm



DELIVERED

Signed for by: M.MARTINEZ

GET STATUS UPDATES

OBTAIN PROOF OF DELIVERY

FROM  
FOR, US

TO  
NM US

## Shipment Facts

**TRACKING NUMBER**

813211769945

**SERVICE**

FedEx 2Day

**WEIGHT**

0.5 lbs / 0.23 kgs

**DELIVERED TO**

Receptionist/Front Desk

**TOTAL PIECES**

1

**TOTAL SHIPMENT WEIGHT**

0.5 lbs / 0.23 kgs

**TERMS**

Shipper

**SHIPPER REFERENCE**

GWPMR JULY DEC 2018 RESP

**PACKAGING**

FedEx Envelope

**SPECIAL HANDLING SECTION**

Deliver Weekday

**SHIP DATE**

2/17/21 [?](#)

**STANDARD TRANSIT**

2/19/21 by 4:30 pm [?](#)

**ACTUAL DELIVERY**

2/19/21 at 1:23 pm

## Travel History

**TIME ZONE**

Local Scan Time

Friday, February 19, 2021

1:23 PM

NM

Delivered



11:04 AM	SANTA FE, NM	On FedEx vehicle for delivery
10:35 AM	SANTA FE, NM	At local FedEx facility
7:11 AM	ALBUQUERQUE, NM	At destination sort facility
5:47 AM	MEMPHIS, TN	Departed FedEx location

**Thursday, February 18, 2021**

5:54 PM	MEMPHIS, TN	In transit
11:40 AM	MEMPHIS, TN	Arrived at FedEx location

**Wednesday, February 17, 2021**

8:06 PM	AKRON, OH	Left FedEx origin facility
1:50 PM	AKRON, OH	Picked up

[Collapse History](#) 