NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6313
Phone (505) 476-6000 Fax (505) 476-6030
www.env.nm.gov

Michelle Lujan Grisham
Governor

Howie C. Morales
Lt. Governor

James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 1, 2021

George H. Cushman
Headquarters, Department of the Army
Office of the DCS, G-9
Army Environmental Office, Room 5C140
600 Army Pentagon
Washington, DC 20310-0600

RE: DISAPPROVAL
FINAL GROUNDWATER PERIODIC MONITORING REPORT
JULY THROUGH DECEMBER 2019
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-20-007

Dear Mr. Cushman:

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *Final Groundwater Periodic Monitoring Report July through December 2019* (Report), dated December 2020. NMED has reviewed the Report, and hereby issues this Disapproval with the attached comments.

The Permittee must submit a revised Report that addresses all comments contained in the attachment. Two hard copies and an electronic version of the revised Report must be submitted to the NMED. The Permittee must also include a redline-strikeout version in electronic format showing where all revisions to the Report have been made. The revised Report must be accompanied with a response letter that details where all revisions have been

made, cross-referencing NMED's numbered comments. The Revised Report must be submitted to NMED no later than **May 31, 2021**.

Should you have any questions, please contact Michiya Suzuki of my staff at (505) 476-6046.

Sincerely,

Dave Cobrain
Program Manager
Hazardous Waste Bureau

cc: B. Wear, NMED HWB
M. Suzuki, NMED HWB
L. McKinney, EPA Region 6 (6LCRRC)
L. Rodgers, Navajo Nation
S. Begay-Platero, Navajo Nation
M. Harrington, Pueblo of Zuni
C. Seoutewa, Southwest Region BIA
A. Whitehair, Southwest Region BIA
G. Padilla, Navajo BIA
J. Wilson, BIA
B. Howerton, BIA
R. White, BIA
C. Esler, Sundance Consulting, Inc.
S. Smith, USACE

File: FWDA 2021 and Reading

Attachment

GENERAL COMMENTS

1. Presentation of Analytical Data in the Tables

NMED Comment: Although the analytical tables were revised to include data collected from the current and three previous monitoring events and the screening levels are presented on every page for comparison, as directed by NMED's *Disapproval Final Groundwater Periodic Monitoring Report January through June 2019,* dated July 1, 2020, the data presentation format used in the groundwater periodic monitoring reports prior to 2019 was not followed in the Report. Accordingly, multiple issues are identified. Some of the issues are listed below:

a) Analytical data presented in previous periodic monitoring reports were reported with two significant figures while the data presented in this Report were reported with seemingly random significant figures. For example, the perchlorate concentrations in the samples identified as MW20042019, MW02102019, and MW20102018 are reported with three significant figures (0.349), one significant figure (<0.1), and two significant figures (0.39), respectively, in Table 5-4, *Summary of Perchlorate Analytical Results*. All analytical tables must be revised to report data with two significant figures to be consistent with previous reports.

b) Some data qualifiers are not defined in the Report. For example, the tetryl concentration in the sample identified as TMW18102018 is reported as 0.21R in Table 5-3, *Summary of Explosives Analytical Results.* However, a notation of "R" is not defined in the pertinent table. Similarly, the RDX concentration in the sample identified as TMW03102019 is reported as 330E in Appendix D-2, *EMAX Electronic Data Deliverables,* page 9,423 of 10,300. However, a notation of "E" is neither shown nor defined in the pertinent table. All data qualifiers must be defined.

c) All data presented with "<" in the tables are shaded with a light gray font, which is barely legible. All data presented in the tables must be presented with clear legible font.

d) Some data are presented with regular black font while the others are presented with bold black font in the tables. However, no explanation was provided to distinguish them. Provide an explanation for the meaning of the bolded values.

e) Some detected analytes (e.g., naphthalene in MW23 during the October 2018 sampling event in Table 5-6, *Summary of TPH and SVOC Analytical Results*) are not listed on the tables. All detected analytes during the current and three previous monitoring events must be listed on the tables.

Revise the Report to correct all issues listed above. The data presentation format must follow groundwater periodic monitoring reports prior to 2019 for consistency, as directed by Comment 1 in the NMED's *Disapproval Final Groundwater Periodic Monitoring Report January through June 2019,* dated July 1, 2020. Revise the Report accordingly.

2. Laboratory Analytical Reports

NMED Comment: The Permittee provided large quantities of data with no indication where to locate a specific sample within a specific analytical laboratory report. NMED's November 7, 2018 *Disapproval Final Permittee-Initiated Interim Measures Report Parcel 6, Revision 1* states:

> For every document that includes analytical data, provide a link for each specific sample to a specific lab report filename (if multiple files are provided) or to a page number in the appendix where the specific lab report can be found (if multiple lab reports are combined into one large file). For Appendices C and F, the lab reports are indexed by lab report number. The Permittee must provide a link to the lab report number for each analyte. For Appendix J, no indexing is provided and multiple laboratory reports are combined. The Permittee must either provide indexing for each report and indicate which particular report contains a particular sample, or provide specific page numbers for each sample ID that indicates where the sample can be found in the lab reports. This information can be provided either in a new table or in the analytical data electronic database.

In addition, these laboratory reports are level IV reports. The Permittee has previously been directed to not submit level IV analytical laboratory reports. NMED's November 7, 2018 also states:

> The Report includes Level IV reports from the analytical laboratories. This has resulted in over 18,000 pages of laboratory reports for this Report. These reports are unneeded and cumbersome. NMED requests that only Level II analytical laboratory reports be included in all submittals. Revise the Report by removing Level IV analytical reports and including Level II analytical reports.

Remove all of the Level IV analytical reports from the revised Report and replace them with Level II analytical reports.

3. Presentation of Bedrock Groundwater Analytical Data in the Figures

NMED Comment: An inset of the magnified image of the Workshop Area is provided in the figures that depict bedrock groundwater analytical data (e.g., Figure 5-2). The bedrock wells in the Workshop Area are sufficiently widespread so that the data can be presented without

an inset. All bedrock groundwater analytical data must be presented without using an inset for clarity. Revise the Report accordingly.

4. **Omission of Well Designation and Sampling Status in the Figures**

NMED Comment: The designation and sampling status (e.g., "NS") of some pertinent wells are missing from the figures. For example, Figure 5-3, *Northern Area Explosives in Alluvial Groundwater - October 2019*, does not provide the designation of alluvial wells TMW13 and TMW28. The designation of all alluvial wells must be shown with their sampling status or sampling results on the figure. Provide the designation and the sampling status for all wells that are missing this information in the revised Report.

SPECIFIC COMMENTS

5. **Executive Summary, lines 25-28, page ES-1, and Section 2.2. Groundwater Sampling, lines 6-8, page 2-2**

Permittee Statement: "Although the Eco team completed sampling the 64 wells by October 10th (12 field days) a field team needed to return to the installation on October 26th to resample 3 wells (TMW04, TMW39D, and TMW48) only for volatile organic compounds (VOCs) since the sample vials arrived at the laboratory frozen and broken."

NMED Comment: Discuss appropriate measures to prevent samples from being frozen in future sample shipments in the revised Report.

6. **Executive Summary, lines 32-36, page ES-1, Section 2.1, Groundwater Elevation Measurements, lines 18-21, page 2-1, Section 4.2, Open Burn/Open Detonation Area Groundwater Elevations, lines 35-37, page 4-2, and Section 5.3, Open Burn/Open Detonation Area Analytical Results, lines 2-5, page 5-5**

Permittee Statements: "During this reporting period, access to the Open Burn/Open Detonation (OB/OD) Area was not available due to explosive hazards associated with excavating and removing unexploded ordnance and munitions and explosives of concern by another contractor. A total of 29 monitoring wells are in the OB/OD Area or within the safety boundary. The Army will resume groundwater monitoring activities within Parcel 3 once hazardous operations are complete."
and,
"Access to the OB/OD Area has not been permitted for periodic monitoring since April 2013 due to explosive hazards associated with excavating and removing unexploded ordnance (UXO) and munitions and explosives of concern. As a result, groundwater elevation measurements were not collected in the OB/OD Area in July 2019 or September 2019, and this report only covers the Northern Area of FWDA."

and,
"Groundwater elevation surveys of the OB/OD Area wells may resume when access to the area is not restricted due to UXO and munition safety concerns."
and,
"No groundwater monitoring was performed in the OB/OD Area during this period. No historical analytical results are available for monitoring events after April 2013. Access to the OB/OD Area has not been permitted for periodic monitoring since April 2013 due to explosive hazards associated with excavation 4 and removal of UXO and munitions and explosives of concern."

NMED Comment: NMED previously issued multiple comments (e.g., Comment 1 in the NMED's *Disapproval Final Parcel 3 Groundwater RCRA Facility Investigation Report*, dated October 17, 2018, Comment 4 in the NMED's *Approval with Modifications Final Revision 1 Parcel 3 Groundwater RCRA Facility Investigation Report,* dated June 14, 2019, Comment 4 in the NMED's *Disapproval Groundwater Monitoring Report July through December 2018,* dated January 30, 2020, and Comment 2 in the NMED's *Approval with Modifications Final Revision 1 Groundwater Periodic Monitoring Report July through December 2018,* dated July 30, 2020) to clarify that the groundwater monitoring for Parcel 3 was required. The Permittee must make safe access arrangements between its contractors to ensure that monitoring is conducted. Failure to conduct work required by NMED constitutes non-compliance and may be subject to an enforcement action. Remove all statements regarding the Parcel 3 groundwater monitoring from the revised Report.

7. **Executive Summary, lines 25-27, page ES-2, and Section 5.2.1, Nitrate and Nitrite, lines 35-37, page 5-1**

Permittee Statement: "The nitrate plume in the alluvial groundwater unit appears to originate from the trinitrotoluene (TNT) Leaching Beds (solid waste management unit [SWMU] 1) and extends downgradient to the Administration Area."
and,
"The highest nitrate concentrations in the alluvial groundwater were found in the Workshop Area immediately downgradient of the TNT Leaching Beds (SWMU 1) (157 mg/L and 117 mg/L in monitoring wells TMW40S and TMW03)."

NMED Comment: The Permittee's *Final Groundwater Periodic Monitoring Report, July through December 2018, Response to January 30, 2020 Disapproval Letter,* dated April 6, 2020, states, "[t]he nitrate plume may potentially have a secondary source originating from historic sanitary sewer lines which may contribute to increasing nitrate concentrations to the west [of the Administration Area]." Include this statement in the revised Report.

8. Executive Summary, lines 28-31, page ES-3, and Section 5.6, New Findings, lines 44-47, page 5-6

Permittee Statement: "Monitoring activities for the new 35 wells are scheduled to begin in year 2020 by sampling the new wells for only 1,4-dioxane for two consecutive events. The new wells will be incorporated into the full suite of analytical starting in year 2022 for four (4) consecutive events."

NMED Comment: The new wells should have been sampled for the full analytical suite. The Permittee was previously directed to analyze 1,4-dioxane using EPA Method 8270 Selective Ion Monitoring (SIM) in groundwater samples collected from wells where chlorinated solvents were previously detected. The Permittee failed to follow this direction. Whether or not chlorinated solvents are detected in 2021, 1,4-dioxane analysis must continue for wells where 1,4-dioxane was previously detected. Include the provision in the next groundwater monitoring plan update.

In addition, the new wells must be sampled for full analytical suite starting in calendar year 2021 rather than 2022. Revise the Report accordingly.

9. Section 2.2, Groundwater Sampling, lines 29-36. Page 2-2

Permittee Statement: "Well purging was performed until water-quality parameters stabilized within the following ranges.
- pH (±0.5 standard units)
- temperature (±10%)
- specific conductance (±10%)
- DO (±10%)
- turbidity (±10%)
- ORP (±10%)"

NMED Comment: Some water-quality parameters (e.g., conductivity, turbidity and dissolved oxygen in well BGMW09, ORP and turbidity in well BGMW01) were not stabilized during well purging as specified, according to Appendix B, *Groundwater Sampling Field Data Sheet*. Comment 5 in the NMED's *Disapproval Final Groundwater Periodic Monitoring Report January through June 2019,* dated July 1, 2020, required the Permittee to provide a justification for why the groundwater samples were considered to be representative of formation water even though some water quality parameters were not stabilized.

The Permittee's November 19, 2020 response letter states, "[w]ell BGMW07 was purged using a Reclaimer pump (gas displacement pump) and the turbidity increased as the water column approached the bottom of the well casing and disturbed much of the settled sediment" and "[t]he field team returned the following day to collect the formation water

that had entered the well casing screen during recharge. This illustrate [sic] that the water sample is representative of the formation water."

The results of total metal analysis for BGMW07 may be affected by the sampling techniques; the amount of sediments suspended in the sample matrix may cause significant variation in analytical results. For example, the total iron concentrations in the groundwater samples collected from well BGMW07 on May 2, 2019, October 12, 2018, and April 26, 2018 are recorded as 2,590 µg/L, 11,000 µg/L, and 780 µg/L, respectively. On the other hand, the dissolved iron concentrations in the groundwater samples collected from well BGMW07 on May, 2, 2019, October, 12, 2018, and April 26, 2018 are recorded as <250 µg/L, 220 µg/L, and 170 µg/L, respectively, according to Table 5-11. Although the dissolved iron concentrations are relatively stable over time, the total iron concentrations significantly vary. Propose a measure to minimize sampling variation in future sampling events and discuss the measure in the revised Report. Note that the water sample would not be representative of the formation water, if analytical results are affected by sampling techniques.

In addition, the Permittee's November 19, 2020 response letter states, "[s]imilarly, Well BGMW08 was purged dry using a hand bailer. Hand bailer was used to collect groundwater from 180 feet below the top of casing and filling the water quality probe cup for data collection, versus using a flow-through cell (which are typically used for low flow dedicated pumps). Air bubbles were most likely trapped on the sensor when the water quality probe was submerged in the cup for data collection, resulting in an increased DO reading" and "[t]he DO readings collected from well BGMW08 were elevated as shown in the purge log form where the lowest reading was 9.14 mg/L and the highest was 17.65 mg/L. Well BGMW08 was purged dry with a submersible pump. The field team returned the following day to collect formation water that entered through the well casing screen during recharge. Since the well was purged dry all water entering the well is considered representative of the formation water."

Theoretical maximum dissolved oxygen (DO) concentration in water at 15 degrees Celsius is approximately 10 mg/L which does not account for elevation above sea level. A DO concentration of 17.65 mg/L would be impossible and the field crew should have discarded the readings and checked the calibration of the field instrument. The water entering the well is representative of the formation water; however, the water sample would not be representative of the formation water unless the sampling techniques are appropriate. Since the Permittee has seemingly identified a cause of inaccurate DO readings in well BGMW08, discuss appropriate measures that will be taken to resolve the issue in the revised Report and implement the measures for future sampling events.

10. Section 3.0, Regulatory Criteria, lines 14-15, page 3-1

Permittee Statement: "The GWMP has been revised annually and submitted to NMED from 2009 through 2018."

NMED Statement: The groundwater monitoring plans were not updated annually. For example, the 2018 update was not submitted. Accordingly, the statement is not accurate. Correct the statement for accuracy or remove the statement from the revised Report.

In addition, Comment 1 in the NMED's *Disapproval Final 2019 Interim Northern Area Groundwater Monitoring Plan Version 11,* dated July 27, 2020, states, "[t]he Permittee submitted a groundwater monitoring plan for 2019, which should have been submitted in fiscal year 2018. The groundwater monitoring plan must discuss the upcoming groundwater monitoring activities planned for 2021. The entire Plan must be revised to propose groundwater monitoring activities for 2022. While the Permittee failed to submit several annual updates to the groundwater monitoring plan, a plan must propose future activities, not past activities or those already underway." The future groundwater monitoring plans must be prepared accordingly.

11. Section 4.0, Groundwater Measurements and Data Collection, lines 7-9, page 4-1

Permittee Statement: "Table 4-1 presents the DTW measurements in feet below top of casing (TOC), the surveyed elevation of the TOC, and the calculated groundwater elevations in feet above the North American Vertical Datum of 1988 (NAVD88)."

NMED Statement: Table 4-1, *Northern Area Groundwater Elevations,* presents depth to water (DTW) readings in feet below top of casing (btoc), screened intervals in feet below ground surface (bgs), and total well depths in feet bgs. Report depth to water readings in feet bgs rather than feet btoc and provide casing stickup lengths with the ground surface elevation data in Table 4-1 so that water and screen depths can directly be compared for each well. Revise the Report accordingly.

12. Section 4.1.2, Northern Area Bedrock Groundwater System, lines 40-42, page 4-1, and lines 5-6, page 4-2

Permittee Statements: "The upper sandstone unit is evaluated by monitoring well TMW02. The remaining bedrock monitoring wells are completed in the lower sandstone unit which is separated from the upper by a thick sequence of shale."
and,
"Well TMW02 is also believed to be in a separate sandstone layer and exhibits a different potentiometric elevation than surrounding bedrock monitoring wells."

NMED Comment: Comment 3 in the NMED's *Approval with Modifications Response to Approval with Modifications, Final Revision 1 Groundwater Periodic Monitoring Report, July through December 2018,* dated November 5, 2020, states, "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." Well TMW02 is appropriately retained as an alluvial groundwater monitoring well in the figures of the Report. However, the statements indicate that well TMW02 is retained as a separate bedrock groundwater monitoring well. Resolve the discrepancy in the revised Report.

13. Section 5.2.5, Other Organic Compounds, line 21, page 5-4, and Section 6.0, Summary, line 20, page 6-2

Permittee Statement: "No SVOC compounds were detected during this reporting period."

NMED Comment: The detection limits of some SVOC compounds (e.g., n-nitrosodimethylamine) listed in Table 3-1, *Groundwater Screening Levels, Detection Limits, and Control Limits,* exceed the applicable screening levels. Section 5.5, *Laboratory Variances from the Work Plan,* lists 42 compounds where the screening level is less than the detection limit. Therefore, the statement does not demonstrate that SVOCs are absent or not present at concentrations above the applicable screening levels.

NMED's May 21, 2019 *Approval with Modifications Letter for the Final 2017 Interim Facility-Wide Groundwater Monitoring Plan, Version 10, Revision 1, Response to NMED Approval with Modifications Letter Dated October 22, 2018* states:

> The Permittee secured a laboratory that is able to achieve adequately low limits of quantification (LOQs) for most contaminants. NMED approves implementation of the enhanced analytical procedures. Propose all changes associated with the enhanced analytical procedures in the next Interim Facility-Wide Groundwater Monitoring Plan (IFGMP) update. However, the Permittee also states, "[i]f the presence of compounds requiring these special analytical methods is not confirmed [in four consecutive sampling rounds], the analytical program will revert to the normal methods that were previously used." The Permittee is required to utilize appropriate analytical labs and methods that are capable of achieving LOQs below the respective SSLs. The Permittee must continue to utilize methods capable of achieving LOQs less than the cleanup levels for all future sampling events.
>
> The Permittee states, "[i]n addition, the previous research showed that n-nitrodimethylamine [sic] [NDMA] was not utilized at Fort Wingate Depot Activity

> (FWDA)." A large portion of the facility is currently leased to and is being utilized by the Missile Defense Agency (MDA). Activities undertaken by MDA are likely to include utilization of rocket fuels. The LOQ provided by the Permittee in replacement Table 5-1 appears to be four orders of magnitude higher than the SSL. Other facilities under NMED RCRA oversight have been able to contract with analytical laboratories that are able to achieve LOQs much closer to the SSL. One facility has utilized ALS labs in Ontario, Canada to achieve 0.5 to 1.0 ng/L. Another facility has utilized TestAmerica Labs to achieve 4 to 5 ng/L. Therefore, an LOQ of 10 µg/L, which is four orders of magnitude greater than the what the two labs listed above are able to achieve, is not acceptable. NMED cannot defend the assertion that NDMA contamination does not exist at FWDA based on laboratory analysis that can only achieve LOQs that are four orders of magnitude higher than the SSL. If the Permittee cannot provide data that meets the standards, then it will not be possible to demonstrate that releases related to MDA operations have not occurred.

In addition, NMED's December 17, 2019 letter regarding *Additional Information Related to the August 16, 2019 Proposal to Reset Enforceable Schedule and Resolve Programmatic Issues at Fort Wingate Depot Activity* states:

> The Permittee is required to use analytical laboratories and methods that can achieve LOQs at or below the screening levels for all constituents of concern. The Permittee has proposed using labs where the LOQ for an analyte is multiple orders of magnitude above the screening level. This is not acceptable. The Permittee will likely need to use more than one lab to achieve the requirement. Other NMED-regulated facilities have been using multiple labs to achieve appropriate LOQs for many years. NMED cannot defend an assertion that a site is clean without data that support such a conclusion. Therefore, any future CAC requests may be disapproved based on NMED's inability to defend that a site is clean based on the Permittee's inability to demonstrate that contaminants are not present above applicable cleanup levels.

The Permittee must utilize methods capable of achieving LOQs less than the cleanup levels for all future sampling events. The direction provided in NMED's previous letters was not followed. Failure to follow NMED direction constitutes noncompliance and may result in an enforcement action.

14. Section 5.2.6, Metals, lines 39-43, page 5-4, and Section 6.0, Summary, lines 23-28, page 6-2

Permittee Statement: "It cannot clearly be demonstrated whether the detected concentrations are a result of natural conditions or anthropogenic sources of contamination

because background metal groundwater concentrations have not been agreed upon with NMED and ARMY. Metals results are not discussed in this PMR. Contaminant plume maps will be generated as part of a future work effort when an agreement between NMED and ARMY has been reached regarding background metal concentrations for total or dissolved metals."

NMED Comment: The NMED's *Disapproval Final Groundwater Background Evaluation,* dated September 15, 2020, requires (1) justification for the use of selected background wells and downgradient wells where the analytical results are to be compared, and (2) clarification concerning the statistical methods used to evaluate background data. Once the revised evaluation report that was to be submitted by **December 31, 2020** is approved by NMED, the Permittee must provide a more thorough discussion regarding the detection of metals in future reports. This comment serves as a reminder. No response required.

15. Section 5.4, Variance from the Work Plan, page 5-5

NMED Comment: Section 1.0, *Introduction,* lines 2-6, page 1-1, states, "[t]his Groundwater Periodic Monitoring Report (PMR) documents the groundwater monitoring activities conducted at Fort Wingate Depot Activity (FWDA) from July 2019 through December 2019 in accordance with the Final 2017 Interim Facility-Wide Groundwater Monitoring Plan, Version 10, Revision 1, Fort Wingate Depot Activity, McKinley County, New Mexico (Groundwater Monitoring Plan [GWMP]; Sundance Consulting, Inc. [Sundance], 2017)."

NMED approved the Permittee's *Interim Northern Area Groundwater Monitoring Plan, Version 10, Revision 1 Request for Work Plan Deviations* on November 12, 2020. Describe the requested and approved deviations in this section of the revised Report, if applicable.

16. Section 6.0, Summary, lines 35-36, page 6-1

Permittee Statement: "The collocated perchlorate and nitrate plumes appear to have a common source at the Building 528 Complex (SWMU 27)."

NMED Comment: Although the perchlorate plume may have originated from the Building 528 Complex (SWMU 27), the highest nitrate concentrations in the alluvial and bedrock groundwater were found in the Workshop Area immediately downgradient of the TNT Leaching Beds (SWMU 1). The nitrate plume may have originated from the TNT Leaching Beds (SWMU 1) rather than the Building 528 Complex (SWMU 27). Correct the statement for accuracy in the revised Report.

Kimberly Rudawsky

From: Christy Esler
Sent: Monday, February 1, 2021 12:21 PM
To: Chasitty Badonie; Kimberly Rudawsky
Cc: Angela Makin
Subject: FW: Letter to Mr. Cushman
Attachments: FWDA 2021- HWB-FWDA-20-007.pdf

Here is another one

From: Martinez, Cynthia, NMENV <cynthia.martinez1@state.nm.us>
Sent: Monday, February 1, 2021 11:58 AM
To: george.h.cushman.civ@mail.mil
Cc: Cobrain, Dave, NMENV <dave.cobrain@state.nm.us>; Wear, Benjamin, NMENV <Benjamin.Wear@state.nm.us>; Suzuki, Michiya, NMENV <Michiya.Suzuki@state.nm.us>; McKinney.Lucas@epa.gov; lasar98@yahoo.com; 'sberan@ashiwi.org' <sberan@ashiwi.org>; Mark.Harrington@ashiwi.org; clayton.seoutewa@bia.gov; alvin.whitehair@bia.gov; george.padilla@bia.gov; judith.wilson@bia.gov; bj.howerton@bia.gov; 'robin.white@bia.gov' <robin.white@bia.gov>; Christy Esler <cesler@sundance-inc.net>; 'Steve.W.Smith@usace.army.mil' <Steve.W.Smith@usace.army.mil>
Subject: Letter to Mr. Cushman

Good Morning,
Please see attachment.

Cynthia Martinez
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Bldg.1
Santa Fe, New Mexico 87505-6313