



Certified Mail - Return Receipt Requested

January 12, 2022

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: FINAL NORTHERN AREA GROUNDWATER MONITORING PLAN, REVISION 2,
ARMY'S RESPONSE
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-20-004**

Dear Mr. Cushman,

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *Final Interim Northern Area Groundwater Monitoring Plan, Revision 2, Army's Response* (Response), dated October 26, 2021. NMED has reviewed the Response, and hereby issues the following comments.

COMMENTS

1. Permittee's Response to NMED's Letter Comment 1, dated August 3, 2021

Permittee Statement: "Please note that PFAS Preliminary Assessment is being conducted at various facilities including FWDA under a separate contract vehicle, which will identify the need for further investigation. The conclusion of the findings will be shared with NMED as appropriate.

NMED Comment: Include the results of the PFAS assessment conducted at FWDA in the next groundwater monitoring plan update. NMED will evaluate the necessity for further PFAS investigation/monitoring at FWDA based on the results. No response is required.

2. Permittee's Response to NMED's Letter Comment 3, dated August 3, 2021

Permittee Statement: "The detailed DO measurement is usually required during the implementation of an in-situ remedy. The Army will implement those tools during the Corrective Measure Study (CMS). As NMED is aware that the current data will not be representative of the conditions at the time the study begins. Please also note that the issue of DO readings is limited to few wells and is not a wide-spread issue at Wingate. Readings from the majority of the wells indicate an aerobic environment in the Northern Area GW regime. Therefore, the Army is respectfully requesting NMED to waive this requirement at this time."

NMED Comment: Accurate DO measurements are critical to assess general groundwater conditions at the site. Although NMED agrees that the referenced DO measurement is likely to be necessary for future implementation of an in-situ remedy, such in-situ remedies would not be appropriately evaluated unless the existing data are accurate and valid. The Permittee must utilize field methods that can provide accurate and valid DO readings. Note that accuracy of the existing data when evaluating remedial alternatives in the Corrective Measure Study (CMS) is important because new data must not be presented in the CMS.

In addition, the site's general groundwater conditions cannot be assumed to be aerobic because the existing DO data is not accurate. In the Permittee's April 19, 2021 letter, the Permittee recommends, "[d]ownhole probes/sondes are available to measure DO and many other in situ water quality parameters. In situ measurement is a much more effective alternative to displacing air from multiple wells." Although the use of in-situ probes may or may not resolve this recurring issue due to agitation/aeration of groundwater while purging a well, NMED agreed that the Permittee could propose to use downhole probes for water quality measurements, where applicable, in the next groundwater monitoring plan update. However, since the Permittee now appears not to agree with its own proposed approach, the Permittee must address Comment 2 of the NMED's March 8, 2021 letter in the next groundwater monitoring plan update by proposing to purge well casings with anoxic gases to ensure accurate DO measurements in groundwater samples collected from the wells where groundwater levels are insufficient. No response is required.

Should you have any questions, please contact Michiya Suzuki of my staff at (505) 690-6930.

Sincerely,



Rick Shean
Chief
Hazardous Waste Bureau

Mr. Cushman
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cc: D. Cobrain, NMED HWB
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.
A. Soicher, USACE

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