



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

January 23, 2018

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

RE: Final Groundwater Periodic Monitoring Report, Revision 1 January through June 2016 (HWB-FWDA-16-013) New Mexico Environmental Department Approval with Modifications letter dated December 15, 2017, Army's Response Letter.

Dear Mr. Kieling:

This letter is in reply to the NMED Approval with Modifications letter dated December 15, 2017, reference number HWB-FWDA-16-013, regarding the Final Revision 1 Groundwater Periodic Monitoring Report January through June 2016. The letter requested a reply to comment one of the Approval. The response is as follows.

1. **The Permittee's Response to Comment 2.g of the Disapproval**

Permittee Statement: "Screening and cleanup levels had not been established for delta-hexachlorocyclohexane (delta-bhc) when the report was prepared. The laboratory limit of detection (LOD) as reported in the laboratory data files (Appendix C – Attachment 2) is 0.021 ug/L. The detected concentration is below the LOD. EPA Regional Screening Levels were established for delta-bhc in 2017. The 2017 screening levels were added to Table 5-7. The report text was revised to state that the detected concentration was below the screening level."

NMED Comment: "Table 5-7, Summary of Pesticides Analytical Results does not include the screening level of delta-hexachlorocyclohexane (delta-bhc). The screening level of beta-hexachlorocyclohexane (beta-bhc) is 0.25 ug/L. Revise Table 5-7 to include the screening level of delta-bhc. In addition, the laboratory data files in Appendix C, Attachment 2, contain multiple analytical reports, which are not relevant to pesticides analysis. Provide a reference to the relevant information (e.g., file name, job number) in a response letter."

Army Response:

The laboratory analytical report containing the reported 0.018 J ug/L detection of delta-hexachlorocyclohexane (delta-bhc) in monitoring well TMW38 is the PDF document titled *J81998-1 Std_Tal_L4_Package_Mini Final Report*. The report contains the data for job number 280-81998-1. The screening level for delta-hexachlorocyclohexane (delta-bhc) will also be reported correctly in future reports and work plans.

If you have questions or require further information, please call me at (505) 721-9770.

Sincerely,

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Mark Patterson
BRAC Environmental Coordinator

CF:

D Cobrain, NMED HWB
B Wear, NMED HWB
M Suzuki, NMED HWB
M Patterson, FWDA BEC
Saqib Khan, USACE SWT
Admin Record, OH / NM