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Certified Mail - Return Receipt Requested

July 6, 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
[REVISED] FINAL GROUNDWATER BACKGROUND EVALUATION
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-20-001**

Dear Mr. Cushman,

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *[Revised] Final Groundwater Background Evaluation* (Report), dated February 19, 2021. NMED has reviewed the Report and hereby issues this Disapproval with the following comments.

COMMENTS

1. Permittee's Response to NMED's Disapproval Comment 2, dated September 15, 2020

Permittee Statement: "Pursuant to the Army's response to the NMED comment #4 from the Groundwater Periodic Monitoring Report July through December 2018; it is not BGMW08 that is providing erroneous geochemical data, but TMW02. As presented in the Army's response (cited above), bedrock groundwater at TMW02 is likely mixing with alluvial groundwater creating erroneous observations. Therefore, the Army has proposed the retention of BGMW08 concurrent with decommissioning TMW02. No changes were made to the revised report."

NMED Comment: The Permittee's statement is outdated and no longer relevant. Comment 3 of the NMED's November 5, 2020 *Approval with Modifications* states, "it is more appropriate to retain well TMW02 as an alluvial groundwater monitoring well and continue to monitor groundwater quality." The Permittee must not abandon well TMW02, as directed.

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Hazardous Waste Bureau - 2905 Rodeo Park Drive East, Building 1, Santa Fe, New Mexico 87505-6313
Telephone (505) 476-6000 - www.env.nm.gov

In addition, Comment 5 of the NMED's *Approval with Modifications Second Response to the Approval with Modifications, Response to Approval with Modifications, Final Revision 1 Groundwater Periodic Monitoring Report, July Through December 2018*, dated March 29, 2021, states, "[t]he Permittee may propose to submit a work plan to install a new background monitoring well in the vicinity of BGMW08. However, the Permittee must not abandon well BGMW08 at this time. Retain well BGMW08 as a bedrock groundwater monitoring well and continue to monitor groundwater quality, as previously directed." The Permittee must comply with the NMED's directions. Include the most updated information in the revised Report.

2. Permittee's Response to NMED's Disapproval Comment 3, dated September 15, 2020

Permittee Statements: "It was determined that there were no detections of anthropogenic compounds in samples collected from BGMW01 and BGMW09. A single detection of one constituent (methyl acetate) out of all of the compounds in these analysis suites was reported from BGMW10." and, "[D]etections of anthropogenic compounds, if any, do not preclude the use of these wells as background monitoring points, as these detections are representative of local or regional conditions."

NMED Comment: According to the *Final Groundwater Periodic Monitoring Report July through December 2019*, dated December 2020, the limits of detection (LODs) for multiple contaminants (e.g., 1,2-diphenylhydrazine, nitrobenzene, nitroglycerin) were reported higher than their respective screening levels in groundwater samples collected from wells BGMW01, BGMW09, and BGMW10. Therefore, the absence/presence of anthropogenic compounds is unknown. Resolve this recurring issue where LODs exceed the screening levels prior to completion of the Groundwater Background Evaluation. The February 1, 2021 email from Mr. Wear of NMED to Mr. Cushman of FWDA provides a clarification and direction regarding the analytes where the LODs exceed the applicable screening levels. In addition, the detection of anthropogenic compounds (e.g., VOCs, explosive compounds) may indicate that the concentrations of the naturally occurring metals and anions have potentially been affected by previous site activities. Unless the LOD issue is resolved and the absence of anthropogenic compounds is demonstrated, the use of wells BGMW01, BGMW09, and BGMW10 for the background evaluation is not appropriate.

3. Permittee's Response to NMED's Disapproval Comment 10, dated September 15, 2020

Permittee's Statement: "The Groundwater Periodic Monitoring Reports from Spring 2009 to Spring 2012 show a collection of 449 samples, with 27% of samples having turbidity greater than 100 NTU. In Fall 2019, 69% of samples had turbidity greater than 100 NTU."

NMED Comment: If sampling techniques are not the cause for the turbidity issues, the condition of the wells may require evaluation. Clogged well screens and other issues can lead to higher turbidity in groundwater, requiring well re-development. If the wells continue to have

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turbidity issues, propose to evaluate current sampling techniques, potential alternative sampling techniques, and the conditions of the wells in the revised Report.

Comment 2 above requires the Permittee to resolve the issue associated with limits of detection (LOD) exceeding the applicable screening levels for multiple compounds to demonstrate the absence/presence of these compounds for the background evaluation. This issue must be resolved and the Permittee must address all comments in this letter and submit a revised Report, a response letter that indicates where all comments were addressed in the revised Report, a redline strikeout electronic version of the revised Report indicating where all changes were made, and a revised electronic copy of the Report no later than **December 31, 2022**.

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

Sincerely,

Ricardo Maestas Digitally signed by Ricardo Maestas
Date: 2021.07.06 16:55:53 -06'00'

Ricardo Maestas, Acting Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
B. Wear, NMED HWB
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