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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: [RESPONSE TO] APPROVAL WITH MODIFICATIONS, FINAL REVISION 1 GROUNDWATER PERIODIC MONITORING REPORT, JANUARY THROUGH JUNE 2018  
FORT WINGATE DEPOT ACTIVITY  
MCKINLEY COUNTY, NEW MEXICO  
EPA ID# NM6213820974  
HWB-FWDA-19-001**

Dear Mr. Cushman,

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *[Response to] Approval with Modifications, Final Revision 1 Groundwater Periodic Monitoring Report, January through June 2018* (Response), dated April 19, 2021. NMED has reviewed the Response and hereby issues this letter with the following comments.

**COMMENTS**

**1. Permittee's Response to NMED's Approval with Modifications Comment 1, dated March 8, 2021**

**Permittee Statement:** "The Army has requested funding for the installation of replacement and background monitoring wells for Parcel 3, and to prepare an abbreviated groundwater monitoring work plan for 8 quarters of groundwater monitoring, as instructed by Dave Cobrain during a conference call held in September 2018. The Army is working towards awarding a contract as directed by NMED in the Approval letter dated January 29, 2021. 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.

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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](http://www.env.nm.gov)

Due to circumstances involving BRAC funding that are beyond the Army's control, the Army apologizes for continuing delays.

Please note the nature of this comment applies to the Parcel 3, January through June 2018 periodic monitoring report, which reports the northern area groundwater monitoring results. The Army respectfully requests to separate this comment from the approval of the document."

**NMED Comment:** The Permittee has failed to address NMED's Comment 1 of the March 8, 2021 *Approval with Modifications*, which states, "[p]roposing to wait until all abandoned monitoring wells are replaced is not acceptable. The groundwater monitoring plan is over a year past due, and the Permittee is liable for penalties that continue to accrue every day that the Permittee does not submit the document." This comment remains unaddressed and unresolved. However, NMED agrees to separate this comment from the review of this submittal. NMED noticed that the Permittee's *Final Groundwater Periodic Monitoring Report January through June 2020*, dated March 30, 2021, did not include a statement regarding the Parcel 3 groundwater monitoring plan; the Permittee should do the same for future groundwater periodic monitoring reports unless the issue is resolved. No response required.

**2. Permittee's Response to NMED's Approval with Modifications Comment 2, dated March 8, 2021**

**Permittee Statement:** "The Army respectfully disagrees with NMED's suggestion to use anoxic gas to displace air from wells prior to retrieving DO samples at low recharge monitoring wells. These wells have been sampled using a bailer, or are purged dry and allowed to recharge just before sampling. Both of these methods inevitably have detrimental effects on sample representativeness for DO. Downhole 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. Displacing air from the head space of wells is unnecessary and a needless expense."

**NMED Comment:** NMED agrees that in-situ DO measurement using downhole probes is more effective and accurate. Propose to use downhole probes for water quality measurements, where applicable, in future groundwater monitoring plan update. No response required.

Mr. Cushman  
July 6, 2021  
Page 3

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

Sincerely,

Ricardo Maestas

Digitally signed by Ricardo  
Maestas  
Date: 2021.07.06 16:36:09  
-06'00'

Ricardo Maestas, Acting Chief  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
B. Wear, NMED HWB  
M. Suzuki, NMED HWB  
L. McKinney, EPA Region 6 (GLCRRC)  
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S. Begay-Platero, Navajo Nation  
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