



MICHELLE LUJAN GRISHAM
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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, SECOND RESPONSE TO THE APPROVAL WITH MODIFICATIONS RESPONSE TO APPROVAL WITH MODIFICATIONS, FINAL REVISION 1, GROUNDWATER PERIODIC MONITORING REPORT, JULY THROUGH DECEMBER 2018
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-19-004**

Dear Mr. Cushman,

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *[Response to] 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* (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 29, 2021

Permittee Statement: "The Army has requested funding for the installation of replacement and background monitoring wells for Parcel 3, in order to gain additional understanding of groundwater in this Parcel, and will use this information to prepare an abbreviated groundwater monitoring work plan for 8 quarters of groundwater monitoring, as instructed

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by Dave Cobrain during a conference call held during September 2018. The Army is working towards awarding a contract, as directed by NMED in the Approval letter dated January 29, 2021.

This approach is necessary due to circumstances involving BRAC funding that are beyond the Army's control; the Army apologizes for continuing delays.

Since the nature of this comment applies to Parcel 3 and not to this report, which covers the July through December 2018 periodic monitoring events, the Army respectfully requests to separate this comment and the respective data from the approval of the current document."

NMED Comment: The Permittee has not responded to NMED's previous comments on this topic. 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 issue remains unaddressed by the Permittee 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, and recommends doing the same for future groundwater periodic monitoring reports until the issue is resolved. No response required.

2. Permittee's Response to NMED's Approval with Modifications Comment 4, dated March 8, 2021

Permittee Statement: "Army respectfully disagrees with NMED's understanding of TMW02; however, Army will retain the TMW02 monitoring well. The Army will include an asterisk/footnote in future reporting of this well as the screen is set across the alluvial and bedrock interface."

NMED Comment: The Permittee has agreed to retain and designate well TMW02 as an alluvial well. For example, the Permittee's response to Comment 12 of the *Final Groundwater Periodic Monitoring Report, July through December 2019, Revision 1, Army's Responses to the New Mexico Environment Department Letter of Disapproval dated February 1, 2021*, dated May 24, 2021, agrees to retain well TMW02 as an alluvial well. TMW02 must be retained as an alluvial well. No response required.

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3. Permittee's Response to NMED's Approval with Modifications Comment 4, dated March 8, 2021

Permittee Statement: "The Army requests to abandon TMW40S and TMW40D to pre-emptively improve the monitoring well network. The two wells are nested within a single boring, and the well could degrade over time and be a conduit for future cross-contamination. The Army proposes to abandon the two wells within the single boring and install two replacement monitoring wells at the same intervals adjacent to the existing boring."

NMED Comment: NMED does not agree that an abandonment and replacement of wells TMW40S and TMW40D are necessary because the wells are intact. If the wells are needed to be replaced in the future, the Permittee may propose to abandon/replace the wells at that time; however, the proposed pre-emptive measure is unnecessary and is not approved. No response required.

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 16:42:43 -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 (GLCRRRC)
L. Rodgers, Navajo Nation
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