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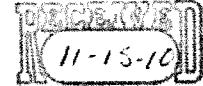


RON CURRY
Secretary

SARAH COTTRELL
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 8, 2010



Mark Patterson
Ravenna Army Ammunition Plant
Building 1037
8451 State Route 5
Ravenna, OH 44266

Steve Smith
CESWF-PER-DD
819 Taylor Street, Room 3A12
PO Box 17300
Fort Worth, TX 76102-0300

**RE: NOTICE OF DISAPPROVAL
FWDA FACILITY-WIDE GROUNDWATER MONITORING
PERIODIC REPORT FOR OCTOBER 2009 TO JANUARY 2010
FORT WINGATE DEPOT ACTIVITY, EPA ID # NM6213820974
FWDA-10-009**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) has completed its review of the U.S. Department of the Army's (the Permittee) *Fort Wingate Depot Activity (FWDA) Facility-Wide Ground Water Periodic Monitoring Report for October 2009 to January 2010*, (Report) dated July, 2010. This submittal is a requirement of Section V.A.2 of the *Fort Wingate Depot Activity RCRA Permit* (RCRA Permit). NMED hereby issues this Notice of Disapproval. The Permittee must address the following comments before NMED can take final action on the Report.

COMMENT 1

In Table 4-1 (Northern Area Groundwater Measurements, Alluvial Monitoring Wells), the Permittee provided depth-to-water (DTW) measurements for each well sampled. There are significant variations between the DTW measurements reported for monitoring well EMW04 in this report and those reported in the *Facility Wide Ground Water Periodic Monitoring Report for April 2009 to July 2009*, dated January 2010. NMED's June 9, 2010, Approval with Direction

required the Permittee to provide a discussion for the variation in subsequent groundwater reports. NMED reiterates that the Permittee must revise the Report to include a discussion on the DTW variations observed in well EMW04 over the past four monitoring events.

COMMENT 2

In Section 4 (Groundwater Monitoring Results), the Permittee includes various groundwater contour maps; however, a number of the maps do not provide information consistent with the data provided in Table 4-1 (Northern Area Alluvial Ground Water Elevation). For example, Figure 4-1 (October 2009 Northern Area Alluvium Ground Water Contour Map) shows that FW29 has a water level elevation of 6642.52; however, the 6645 foot groundwater contour line runs through the well location. In addition, well FW29 is not included in Table 4-1. TWM06, TMW07, and TMW23 have groundwater elevations in the 6642 foot range; however, the 6642 foot contour line does not intersect the well locations. In Figure 4-2 (January 2010 Northern Area Alluvium Ground Water Contour Map), the elevation contour lines are not consistent with the groundwater elevations listed for FW29, TMW31S, SMW01, MW01 and TMW13. In Figure 4-3 (January 2010 Northern Area Bedrock Groundwater Contour Map), contour lines do not correspond to the elevations listed for TMW36, TMW02, and TMW16. The Permittee must revise the Report to include contour maps that are consistent with groundwater elevations as well as tables that include all wells that are shown on the maps.

COMMENT 3

In Section 7.0 (Recommendations) the Permittee states “[m]onitoring wells CMW20 and CMW21 can no longer be used for collecting groundwater samples. Flooding during the summer of 2009 buried CMW 21 beneath sediment. This monitoring well should be abandoned while its location is still known. Flooding has damaged CMW20.” While NMED concurs with the abandonment of monitoring wells CMW20 and CMW21, the Permittee may be required to install new wells near this location, depending on the results of future groundwater monitoring. The Permittee must submit a work plan to NMED proposing to abandon these wells and that describes the proposed methods for well abandonment (or replacement). The Permittee must comply with 19.27.4 NMAC.

COMMENT 4

In Section 7.0 (Recommendations) the Permittee states “[a]ppendix F contains a proposed sampling plan based on non-detected constituents for four sampling events over a two year period.” The Permittee also proposes to remove constituents from the sampling and analyses plan where results have repeatedly been non-detect for four consecutive sampling events. NMED concurs with the sampling plan provided in Appendix F. However, based on future

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sampling results the Permittee may be required to modify the sampling plan or install new monitoring wells. No revisions to the Report are necessary.

The Permittee has been submitting groundwater monitoring reports for each event shortly before the next sampling event, which does not allow NMED enough time to provide input prior to the next sampling event. Beginning with the 2011 sampling event the Permittee must therefore submit all Facility Wide Groundwater Monitoring Reports within 60 days after the sampling and monitoring has been completed.

The Permittee must address all comments contained in this letter and submit a revised Report. The Permittee must include a cover page with the revised document that indicates that the submittal is a revision and was prepared for NMED. The revised document must be accompanied with a response letter that details where all revisions have been made, cross-referencing NMED's numbered comments. The Permittee must also submit an electronic copy of the revised document with all edits and modifications shown in redline-strikeout format. The revised Report must be submitted to NMED no later than December 30, 2010.

The work plan to plug and abandon CMW 20 and CMW 21 is also due, as a separate document no later than December 30, 2010 (see also Comment 3).

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If you have questions regarding this approval please contact Tammy Diaz of my staff at 505-476-6056.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

cc: Dave Cobrain NMED HWB
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File: FWDA 2010 & Reading File
HWB-FWDA-10-009