



Michelle Lujan Grisham
Governor

Howie C. Morales
Lt. Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Hazardous Waste Bureau

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED



James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

November 20, 2020

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: APPROVAL WITH MODIFICATIONS
FINAL REVISION 1 PARCEL 3 GROUNDWATER BACKGROUND WELLS AND
REPLACEMENT MONITORING WELLS INSTALLATION WORK PLAN
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-19-005**

Dear Mr. Cushman:

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *Final Revision 1 Parcel 3 Groundwater Background Wells and Replacement Monitoring Wells Installation Work Plan* (Work Plan), dated June 2020. NMED has reviewed the Work Plan, and hereby issues this Approval with Modifications with the attached comments.


The Permittee must address all comments in the attachment and submit a response letter and the required replacement pages no later than **December 31, 2020**.

This approval is based on the information presented in the document as it relates to the objectives of the work identified by NMED at the time of review. Approval of this document does not constitute agreement with all information or every statement presented in the document.

Mr. Cushman
Rev. 1 P3 Wells Installation WP
Page 2

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

Sincerely,

**Kevin
Pierard**  Digitally signed by
Kevin Pierard
Date: 2020.11.20
16:22:10 -07'00'

Kevin M. Pierard, Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
B. Wear, NMED HWB
M. Suzuki, NMED HWB
C. Hendrickson, EPA Region 6 (6LCRRC)
L. Rodgers, Navajo Nation
S. Begay-Platero, Navajo Nation
M. Harrington, Pueblo of Zuni
C. Seoutewa, Southwest Region BIA
G. Padilla, Navajo BIA
J. Wilson, BIA
B. Howerton, BIA
R. White, BIA
C. Esler, Sundance Consulting, Inc.
S. Smith, USACE

File: FWDA 2020 and Reading

Attachment

1. Permittee's Response to NMED's Disapproval Comment 1, dated February 5, 2020

Permittee Statement: "The Army respectfully requests to proceed to install the well as proposed in this Work Plan."

NMED Comment: The Permittee investigated accessibility in the vicinity of the arroyo approximately 1,500 feet east of well BGMW05 and found that the location was not accessible. Accordingly, the proposed location approximately 2,500 feet northeast of well BGMW05 is hereby approved. The Permittee may proceed to install the well at the proposed location. No response required.

2. Permittee's Response to NMED's Disapproval Comment 2, dated February 5, 2020

Permittee Statement: "The Army has attached the approved plugging plan of operations and the NMOSE approval letters to this letter."

NMED Comment: Attachment 1, *New Mexico Office of the State Engineer Approval Letters, Well Plugging Plan of Operations* included the approved plugging plans for wells FW38, CMW06, CMW07, CMW10, CMW14, CMW17, CMW18, CMW19, CMW20, and CMW21; however, did not include a plan for CMW33B. Instead, an approved plan for well G-191 was included. NMED's Disapproval Comment 2 requires submission of the approved plan for CMW33B, as well. Clarify whether well G-191 refers to well CMW33B in a response letter. If so, explain why the designation of the well was changed in the response letter.

3. Permittee's Response to NMED's Disapproval Comment 2, dated February 5, 2020

Permittee Statement: "For Clarification, monitoring well CMW19 was abandoned due to damage incurred during flooding in Parcel 3."

NMED Comment: The plan was approved in May 21, 2019; therefore, the flooding event presumably occurred prior to the date but not too long ago. Provide an approximate date when the flooding event occurred. Under such circumstances, the Permittee must report the conditions of monitoring wells to NMED and propose to abandon them, if appropriate, in the future.

4. Permittee's Response to NMED's Disapproval Comment 6, dated February 5, 2020

Permittee Statement: "The Army added a provision that efforts to achieve the installation of productive groundwater monitoring wells will be attempted; however, given the extensive soil excavation and rework in the area, and the proven lack of overall groundwater within Parcel 3, the Army cannot ensure every proposed well will produce sufficient groundwater."

NMED Comment: The Permittee’s response to NMED’s Disapproval Comment 7 states, “[t]he Army added a provision to install temporary monitoring wells in the event a saturated zone within the planned depth of the boring is not encountered.” The provision should ensure that every well installed at the site produces groundwater. Additionally, NMED’s Disapproval Comment 7 requires the Permittee to contact NMED to discuss alternative locations if water is not produced from temporary wells. Section 3.4, where NMED’s Disapproval Comments 6 and 7 were addressed, does not include the provision to contact NMED to discuss alternative locations. Include the provision in the appropriate replacement pages for the Work Plan.

5. Section 3.4.2, Subsurface Soil Sampling, lines 39-41, page 3-4

Permittee Statement: “Soil samples will be collected at three intervals at each boring. One sample will be collected within the first 3 feet from ground surface, one from the saturated zone, and the final sample collected at the borehole termination depth.”

NMED Comment: Explain the basis for collecting soil samples within the first three feet from ground surface in the response letter. Soil contamination may likely be detected near ground surface (e.g., within six inches from ground surface). Revise the proposed sampling depth to propose to collect samples within six inches of the ground surface and provide replacement pages.

Kimberly Rudawsky

From: Christy Esler
Sent: Monday, November 23, 2020 12:23 PM
To: Kimberly Rudawsky; Chasitty Badonie
Cc: Angela Makin
Subject: FW: Letters to Mr. Cushman
Attachments: 2020-11-20 AM FWDA-19-005.pdf; 2020-11-20 D FWDA-20-005.pdf

Please see attached NMED letters for processing.

From: Smith, Steven W CIV USARMY CESWF (USA) <Steve.W.Smith@usace.army.mil>
Sent: Monday, November 23, 2020 11:01 AM
To: Khan, Mohammad Saqib (Saqib) CIV USARMY CESWF (USA) <Mohammad.S.Khan@usace.army.mil>; Myers, Dennis J CIV USARMY CESWF (USA) <dennis.j.myers.civ@mail.mil>; Slavens, Michael R CIV USARMY CESWF (USA) <Michael.R.Slavens@usace.army.mil>
Cc: george.h.cushman.civ@mail.mil; Angela Makin <amakin@sundance-inc.net>; Christy Esler <cesler@sundance-inc.net>
Subject: FW: Letters to Mr. Cushman

Gents,

Passing these letter on to you. I haven't read them yet, but I see NMED wants a revised report on the second letter by 12/31/2020 – ha ha.

Steve

From: Martinez, Cynthia, NMENV <cynthia.martinez1@state.nm.us>
Sent: Monday, November 23, 2020 9:35 AM
To: george.h.cushman.civ@mail.mil
Cc: Pierard, Kevin, NMENV <Kevin.Pierard@state.nm.us>; Cobrain, Dave, NMENV <dave.cobrain@state.nm.us>; Wear, Benjamin, NMENV <Benjamin.Wear@state.nm.us>; Suzuki, Michiya, NMENV <Michiya.Suzuki@state.nm.us>; 'hendrickson.charles@epa.gov' <hendrickson.charles@epa.gov>; lasar98@yahoo.com; srbp@navajoadvantage.com; Mark.Harrington@ashiwi.org; clayton.seoutewa@bia.gov; george.padilla@bia.gov; judith.wilson@bia.gov; bj.howerton@bia.gov; 'robin.white@bia.gov' <robin.white@bia.gov>; Christy Esler <cesler@sundance-inc.net>; Smith, Steven W CIV USARMY CESWF (USA) <Steve.W.Smith@usace.army.mil>
Subject: [Non-DoD Source] Letters to Mr. Cushman

Good Morning,
Please see attachments.

Cynthia Martinez
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Bldg.1
Santa Fe, New Mexico 87505-6313