



**Michelle Lujan Grisham**  
Governor

**Howie C. Morales**  
Lt. Governor

**NEW MEXICO  
ENVIRONMENT DEPARTMENT**

**Hazardous Waste Bureau**

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**James C. Kenney**  
Cabinet Secretary

**Jennifer J. Pruett**  
Deputy Secretary

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

November 5, 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  
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, Final Revision 1 Groundwater Periodic Monitoring Report, July through December 2018* (Response), dated September 21, 2020. NMED has reviewed the Response and hereby issues this Approval with Modifications with the attached comments. The Permittee must address all comments in the attachment to this letter and submit a response letter no later than **February 26, 2021**.

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  
Response to AM 2018 Jul – Dec GW PMR  
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: 2020.11.05  
10:36:59 -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 Approval with Modifications Comment 2, dated September 21, 2020**

**NMED Comment:** The Permittee installed new groundwater monitoring wells in Parcel 3 under a work plan approved by NMED in 2016. Any approvals regarding groundwater monitoring in Parcel 3 prior to that time period are not relevant. The Permittee then sampled the wells without an approved monitoring work plan from NMED. On October 17, 2018, the Permittee was directed to provide a periodic monitoring report for groundwater samples collected in 2018, as well as provide a groundwater monitoring work plan for the area. The Permittee failed to submit the required documents and was subsequently issued a Notice of Violation on June 20, 2019. The Permittee continues to present the same arguments that were not accepted by NMED. The Permittee is in violation of their Permit and is subject to enforcement.

**2. Permittee’s Response to NMED’s Approval with Modifications Comment 3, dated July 30, 2020**

**Permittee Statement:** “The Army will submit a well abandonment plan for Well 69 for review and approval to NMOSE. Copies of the approved work plan will be submitted to NMED for NMED’s administrative records.”

**NMED Comment:** In a response letter, propose the date for submittal of the well abandonment plan for Well 69 to the New Mexico Office of the State Engineer (NMOSE).

**3. Permittee’s Response to NMED’s Approval with Modifications Comment 4, dated July 30, 2020**

**Permittee’s Statements:** “The Army would like to propose abandoning TMW02, as it is being influenced locally by alluvial groundwater as explained below. Other bedrock wells have been installed during the Northern Area Groundwater adjacent to TMW02 and would provide coverage in monitoring groundwater conditions. The Army also proposes to abandon BGMW08 as a background well due to low recharge rates.”

and,

“Alluvial wells and TMW02 show elevated and similar concentration levels of selenium compared to near bedrock wells. TMW02 is likely measuring a mixture of both alluvial and bedrock groundwater quality.”

**NMED Comment:** Attachment 2, *Selenium Concentrations from TMW02 Compared to Adjacent Alluvial and Bedrock Groundwater Concentrations, Last Seven Monitoring Events*, demonstrates that the groundwater collected from well TMW02 represents alluvial groundwater quality rather than a mixture of both alluvial and bedrock groundwater quality. Therefore, it is more appropriate to retain well TMW02 as an alluvial groundwater

monitoring well and continue to monitor groundwater quality. Designate well TMW02 as an alluvial well in future submittals, as appropriate.

Low level detections of perchlorate in the groundwater samples collected from well BGMW08 were previously reported. Since the groundwater flow direction in the bedrock aquifer at the site is not completely understood, these detections may indicate the leading edge of the perchlorate plume. Therefore, retain well BGMW08 as a bedrock groundwater monitoring well and continue to monitor groundwater quality. Designate well BGMW08 as a bedrock monitoring well rather than a background monitoring well in future submittals.

## Kimberly Rudawsky

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**From:** Christy Esler  
**Sent:** Friday, November 6, 2020 9:49 AM  
**To:** Chasitty Badonie; Kimberly Rudawsky  
**Cc:** Angela Makin  
**Subject:** FW: Letter to Mr. Cushman  
**Attachments:** 2020-11\_05 AM FWDA-19-004.pdf

### APPROVAL WITH MODIFICATIONS RESPONSE TO APPROVAL WITH MODIFICATIONS, FINAL REVISION 1 GROUNDWATER PERIODIC MONITORING REPORT, JULY THROUGH DECEMBER 2018

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**From:** Martinez, Cynthia, NMENV <cynthia.martinez1@state.nm.us>  
**Sent:** Friday, November 6, 2020 9:42 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>; 'Steve.W.Smith@usace.army.mil' <Steve.W.Smith@usace.army.mil>  
**Subject:** Letter to Mr. Cushman

Good Morning,  
Please see attachment.

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