



SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor

State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6313
Phone (505) 476-6000 Fax (505) 476-6030
www.env.nm.gov



BUTCH TONGATE
Cabinet Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

October 22, 2018

Mark Patterson
BRAC Environmental Coordinator
Fort Wingate Depot Activity
13497 Elton Road
North Lima, OH 44452

Steve Smith
USACE
CESWF-PER-DD
819 Taylor Street, Room 3B06
Fort Worth, TX 76102

**RE: APPROVAL WITH MODIFICATIONS
FINAL 2017 INTERIM FACILITY-WIDE GROUNDWATER
MONITORING PLAN VERSION 10 REVISION 1
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-17-007**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *Final 2017 Interim Facility-wide Groundwater Monitoring Plan, Version 10 Revision 1* (Plan) dated July 27, 2018. NMED has reviewed the Plan and hereby issues this Approval with Modifications. The Permittee must address the following comments.

1. The Permittee’s Response to NMED’s Disapproval Comment 5

Permittee Statement: “This statement refers to potable water uses only. The well [Well 69] is however utilized as a minor non-potable water supply.”

NMED Comment: Statements such as “[t]his mound may be the result of leakage from inactive artesian water supply Well 69,” and “[a]lthough this water supply well is no longer in use...” in Section 3.5.1, *Northern Area Alluvial Groundwater System*, are misleading.

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Unless an explanation is provided, readers may assume that Well 69 is completely inactive. Section 3.5.1 must be revised for clarification. Provide a replacement page for Section 3.5.1. In addition, note that Comment 6 in the NMED's *Disapproval for Final Groundwater Periodic Monitoring Report July through December 2017*, dated September 4, 2018, directs the Permittee to propose collection of groundwater samples from Well 69 in the upcoming Interim Facility-wide Groundwater Monitoring Plan (IFGMP).

2. The Permittee's Response to NMED's Disapproval Comment 9

Permittee Statements: “[o]nly 15 of these analytes [that have screening values lower than the limit of quantification (LOQ)] have been previously detected in groundwater at FWDA.”
and,
“LOQ that is below the project screening level cannot be achieved for these compounds.”
and,
“Three DOD-ELAP accredited laboratories were contacted...”

3. **NMED Comment:** The Permittee contacted only three laboratories in their attempt to resolve this issue. A cursory review of the DOD-ELAP website indicates that there are over 85 DOD-ELAP certified analytical laboratories. Therefore, the Permittee's efforts appear to be insufficient. The Permittee must solicit LOQ values from additional laboratories for all analytes where their current lab LOQ values exceed the screening levels. Failure to demonstrate that the analyte concentrations are below the appropriate screening levels will result in the inability of NMED to support corrective action complete determinations for FWDA. In addition, chemical analysis using an electron capture detector (ECD) offers very low sensitivities in the parts per trillion range. The LOQs may be significantly lowered using an ECD for detection of these analytes. Evaluate the viability of lowering LOQs for some of these compounds using ECD. The use of ECD may also eliminate some matrix effects. Discuss all findings in a response letter. Also, secure analyses from labs which have LOQs below the screening levels in the next version of the IFGMP.

4. The Permittee's Response to NMED's Disapproval Comment 11

Permittee Statement: “Table 5-1 has also been updated to reflect this information.”

NMED Comment: Perchlorate is listed with a superscript of “7” in Table 5-1. Note 7 states, “[a]nalyte is a laboratory surrogate used in analytical procedures, and risk in groundwater will not be evaluated.” The statement is irrelevant to the discussion regarding the EPA MCL for perchlorate. In addition, risk in groundwater must be evaluated for perchlorate, if detected. The statement in Note 7 must be corrected. In addition, some compounds in Table 5-1 are listed with a superscript of “8”; however, no information is noted for the superscript of 8 in the table. Provide a replacement table that resolves the issues.

5. Table 4-1, Groundwater Purge Method, Table 5-2, Water Level Measurements by Groundwater Zone, and Table 5-3, Groundwater Sampling Matrix

NMED Comment: The tables include information regarding both the OB/OD and Northern Areas. Comment 1 in NMED's *Disapproval for Final Parcel 3 Groundwater RCRA Facility Investigation Report*, dated October 17, 2018 directs that upcoming IFGMP for the groundwater monitoring events to be conducted at Parcel 3 must be separated from the groundwater monitoring events to be conducted at the Northern Area. Therefore, two separate Plans (one for the OB/OD Area and the other for the Northern Area) are required in the upcoming IFGMP. No revisions are necessary to this Plan.

6. Table 5-3, Groundwater Sampling Matrix

NMED Comment: Comment 4 in NMED's September 4, 2018 *Disapproval* directs the Permittee to add EDB analysis to all monitoring wells where gasoline-related contaminants have been detected. Accordingly, Table 5-3 will address the change in the upcoming updated IFGMP. In the upcoming IFGMP version 11, Table 5-3 must indicate all changes that were made to the Plan and provide rationale for the changes. No revision is necessary to this Plan.

The Permittee must address all comments in this Approval with Modifications in a response letter that cross-references where the modifications were addressed in the Plan. The Permittee must also provide replacement pages and tables, where applicable. Additionally, an electronic redline-strikeout version of the Plan and a revised electronic copy of the Plan must be submitted to NMED no later than **December 31, 2018**.

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.

Messrs. Patterson and Smith
October 22, 2018
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Should you have any questions, please contact Michiya Suzuki of my staff at (505) 476-6059.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
B. Wear, NMED HWB
M. Suzuki, NMED HWB
C. Hendrickson, U.S. EPA Region 6
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.

File: FWDA 2018 and Reading, Groundwater, FWDA-17-007