



DEPARTMENT OF THE ARMY
OFFICE OF THE DEPUTY CHIEF OF STAFF, G-9
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

September 20, 2021

Base Realignment and Closure Operations Branch

Mr. Ricardo Maestas
Chief, Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

RE: Final Groundwater Periodic Monitoring Report, July through December 2019 Revision 1, Approval with Modifications, HWB-FWDA-20-007, Fort Wingate Depot Activity, McKinley County, New Mexico. EPA# NM6213820974

Dear Mr. Maestas:

This letter provides responses to the comments issued in the Approval with Modifications Letter, Final Groundwater Periodic Monitoring Report, July through December 2019, Revision 1, from the New Mexico Environment Department (NMED), dated July 22, 2021. In addition to the comment response provided in this letter, one (1) electronic (CD) copy of the revised Appendix D-2, EMAX Electronic Data Deliverables, is enclosed for your review and consideration.

COMMENTS

1. Permittee's Response to NMED's Disapproval Comment 2, dated February 1, 2021

Permittee Statement: "The Level IV reports were replaced with Level II laboratory reports and future reports will be limited to Level II."

NMED Comment: Appendix D-2, EMAX electronic Data Deliverables, still contains the same number of pages with the Level IV reports (10,300 pages). The Level IV reports were not replaced with Level II laboratory reports. Remove all of the Level IV analytical reports from the Report and replace them with Level II analytical reports. Once the Level II reports are provided, the Permittee must provide a link for each specific sample to a specific laboratory report. This is a requirement for all data submitted in this Report and all future reports. Provide the Level II reports, as well as a table that provides a link for each individual sample to a specific laboratory report. Failure to follow NMED direction constitutes noncompliance and may result in an enforcement action.

Permittee's Response: Comment acknowledged. Although NMED only requires Level II data analysis, the Army receives Level III and Level IV data for review per Army policy. Considerable effort was made to manually remove the excess pages, but the current laboratory included chromatograms in their Level II data. The Army has now manually removed these chromatograms pages as well, and is working with the lab to streamline this process going forward. A Table of Contents listing all the wells, with links to the relevant lab report and a page listing, is now provided in the beginning of Appendix D-2.

2. Permittee's Response to NMED's Disapproval Comment 9, dated February 1, 2021

Permittee Statements: "To prevent anomalous water quality data from Wells BGMW09 and BGMW01 during future sampling events, the submersible pump flow rate will be decreased to reduce the amount of suspended solids during parameter collection."

and, "Corrective measures [for DO measurement] include proper calibration of field instruments prior to deployment, effective training of field team, and troubleshooting procedures."

NMED Comment: The [Response to] Approval with Modifications, Final Revision 1 Groundwater Periodic Monitoring Report, January through June 2018, dated April 19, 2021, states that downhole probes/sondes are available to measure DO and other in-situ water quality parameters, and in-situ measurements are a more effective alternative to displacing air from multiple wells. NMED agrees that in-situ DO measurement using downhole probes would be more effective and accurate. Propose to use downhole probes for water quality measurements and procedures for collecting measurements, where applicable, in the next groundwater monitoring plan update. No revision required.

Permittee's Response: Comment Noted. The Army is evaluating the use of downhole probes for water quality measurement. For normal groundwater monitoring, the water quality parameters, such as DO via field instruments, is a standard industry practice. The detailed DO measurement is usually required for the implementation of the a in-situ remedy. The Army will implement those tools when it initiates the Corrective Measure Study (CMS). As NMED is aware, the current data will not be representative of the conditions at the time the study begins.

Please note that the issue of DO readings is limited to few wells and is not a wide-spread issue at Wingate. Readings from the majority of the wells indicate an aerobic environment in the Northern Area GW regime. Therefore, the Army is respectfully requesting NMED to waive this requirement at this time.

3. Permittee's Response to NMED's Disapproval Comment 10, dated February 1, 2021

Permittee Statement: "The current GWMP [Groundwater Monitoring Plan] Version 11 will address sampling procedures for year 2022..."

NMED Comment: The groundwater monitoring plan must include the relevant year (2022) instead of the version number on the title of the submittal. This comment serves as a reminder; no revision required.

Permittee's Response: Concur: All GWMPs will incorporate the year into the title instead of the version number.

4. Permittee's Response to NMED's Disapproval Comment 13, dated February 1, 2021

Permittee Statement: "With the exception of TPH-GRO and TPH-DRO, the overall list of DQEs [sic] do not have direct implications to the groundwater monitoring program at FWDA. The Army and its subcontractor have been evaluating the LOD and LOQ screening level detection limit issue (including NOMA) and is awaiting BRAC Headquarters approval and guidance."

NMED Comment: The statement is not correct. The LOQs for 42 compounds exceed the applicable screening levels. Therefore, all compounds listed as data quality exceptions potentially have direct implications to the interim groundwater monitoring program.

The Permittee states that the Army and its subcontractor are awaiting BRAC Headquarters approval and guidance. However, NMED has already provided the Permittee the specific direction to resolve this recurring issue through the February 1, 2021 email from Mr. Wear of NMED to Mr. Cushman of FWDA. Please resolve this issue in a timely manner. Failure to follow NMED direction constitutes noncompliance and may result in an enforcement action. No revision required to the Report.

Permittee's Response: Comment Noted: The Army is formalizing its research in a presentable format for NMED input. The research will show the number of labs that can meet the screening levels for the compounds in question. The Army is also working on developing a strategy to utilize some of those labs. The Army is working on presenting a workable solution that is achievable and is accepted to both parties. We sincerely apologize for the delay.

If you have questions or require further information, please contact me at George.h.cushman.civ@army.mil, 703-455-3234 (Temporary Home Office, preferred) or 703-608-2245 (Mobile).

Sincerely,



George H. Cushman IV
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Fort Wingate Depot Activity
BRAC Operations Branch
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Enclosures

CF:

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