



MICHELLE LUJAN GRISHAM
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JAMES C. KENNEY
CABINET SECRETARY

Certified Mail - Return Receipt Requested

July 25, 2022

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 GROUNDWATER PERIODIC MONITORING REPORT
JULY THROUGH DECEMBER 2020 REVISION 2
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-21-003**

Dear Mr. Cushman,

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *Final Groundwater Periodic Monitoring Report, July through December 2020 Revision 2* (Report), dated June 2022. NMED has reviewed the Report, and hereby issues this second Approval with Modifications. The Permittee must respond to the following comments.

COMMENTS

1. Permittee's Response to NMED's Approval with Modifications Comment 2, dated April 5, 2022

Permittee Statement: "It appears that January 2019 reading is an anomaly, most likely due to human error in recording the water level."

NMED Comment: The Permittee's response to Comment 18 of the NMED's July 1, 2020 *Disapproval* states, "[t]he groundwater elevations were all verified through multiple measurements during the field monitoring events and confirmed to accurately record the depth to water." The Permittee's two statements are contradictory. Furthermore, Comment

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8 of the NMED's March 8, 2021 *Disapproval* states, "[t]he Permittee asserts that the measurements are correct. If so, well BGMW08 may be damaged or poorly constructed and a conduit for contaminant migration." NMED is concerned that groundwater retained in well BGMW08 may be leaking from the well casing. Submit a work plan to investigate the integrity of well BGMW08 no later than **December 31, 2022**.

2. Permittee's Response to NMED's Approval with Modifications Comment 3, dated April 5, 2022

Permittee Statement: "ORP and Eh both quantify the potential to transfer electrons; however, Eh is defined as a voltage reading relative to the Standard Hydrogen Electrode (SHE), while ORP maybe relative to any reference electrode based upon the construction of the field measuring device."

NMED Comment: The intent of the statement is not clear. NMED's *Approval with Modifications* Comment 3 requires the Permittee to discuss the purpose of converting ORP to Eh. Clearly explain (a) why it is necessary to convert ORP readings to Eh and (b) whether ORP readings reported by one field instrument would be different from the readings reported by others in a response letter. Provide a response and replacement pages.

3. Permittee's Response to NMED's Approval with Modifications Comment 4, dated April 5, 2022

Permittee Statement: "This report and future reports will reflect all non-detects to be <LOD. All figures and tables were revised accordingly."

NMED Comment: Although the October 2020 analytical data were correctly revised to report non-detects as <LOD, the Report contains three additional data sets previously collected (i.e., April 2020, April and October 2019 data) and the non-detects were still reported as <DL for them. Although it is not necessary to correct the tables in this Report, the Permittee must provide accurate tables in all future reports, including the data listed for the previous three events. For this Report, the Permittee can either correct the tables or provide clarification by adding a footnote to each table that states that the non-detects are reported as <DL instead of <LOD. Provide replacement tables.

The Permittee must address all comments in this letter and submit a response letter detailing where changes were made in the revised Report in response to each comment; two copies of the replacement pages and tables; and two CDs each including the revised Report and a redline strikeout version of the revised Report no later than **October 31, 2022**. In addition, the work plan required by Comment 1 must be submitted no later than **December 31, 2022**.

Mr. Cushman
July 25, 2022
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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.

Should you have any questions, please contact Michiya Suzuki of my staff at (505) 690-6930.

Sincerely,

Rick Shean
Digitally signed by Rick Shean
Date: 2022.07.25 14:53:11 -06'00'

Rick Shean
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
B. Wear, NMED HWB
M. Suzuki, NMED HWB
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