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NMED

Steven Leonard Palmer Restoration Program Manager AFCEC/CZO 402 S. Chindit Blvd. Cannon AFB NM 88103-5003

Mr. Gabriel Acevedo
Environmental Scientist & Specialist-Operational
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Bldg. 1
Santa Fe NM 87501

Dear Mr. Acevedo:

Cannon Air Force Base is pleased to provide the amended replacement pages for the "Monitoring Well Abandonment and Installation Work Plan" as requested by NMED in the 7 July 2017 "Approval with Modifications" letter. Also included are responses to NMED comments and electronic copies of these files to include an MS Word file with redlines.

Cannon AFB appreciates the valued working relationship established with you and your department. If you have further comments or questions pertaining to the referenced replacement pages and Response Letter, please contact Steven Palmer, steven.palmer@us.af.mil (575) 904-6744 or Sheen T. Kottkamp, sheen.kottkamp.ctr@us.af.mil (575) 904-6743.

Sincerely,

Steven Leonard Palmer

Attachments:

Replacement Pages; Monitoring Well Abandonment and Installation Work Plan

Response Letter

Common Comment and Response Worksheet (Version 3)

	Date	Reviewer					Document Title (version)	Contract/TO Number			
7-Jul-17		NMED					Monitoring Well Abandonment and Installation Work Plan	FA8903-13-C-0008			
Iten	Source	Section Page Para Line Class		Class	Comment	Response					
1		Well Completion, Screen Lengths	3				In order to prevent the dilution of detected chemicals of concern, the submerged portion of the well screen must not exceed 30-feet for replacement monitoring wells MW-Sa, MW-Ta, and MW-Ua. The well screens for replacement monitoring wells MW-Sa, MW-Ta, and MW-Ua must be set with approximately three feet of screen above the groundwater table and 32-feet of screen below the groundwater table for a maximum length of 35-feet of screen for each monitoring well. Revise the Work Plan to reflect the required change to the replacement monitoring well screen lengths.	Agree. The screen lengths for wells MW-Sa, MW-Ta, and MW-Ua will be revised in the table. A note will be added to the table reading "Top of screen will be based on field observations of water table during drilling. Top of screen will be placed approximately 3' above top of water." Additionally, the following will be added to the text on page 3: "Screen placement will be based on field observations of groundwater depth during drilling. Top of screen will be placed approximately 3 feet above the water table."			
2		Field Activities Documentation Reporting	and groundwater sampling activities must be provided in a summary report that includes descriptions of a activities, data collection, and supporting documentation. The Report must be provided to NMED no later days following completion of the proposed field activities. Revise the Work Plan to include the reporting			Agree. A "Reporting" section will be added to the text after "Investigation Derived Waste and Waste Characterization" that reads "The results of monitoring well abandonment, new monitoring well installation, monitoring well development, and groundwater sampling activities will be provided in a summary report that includes descriptions of all field activities, data collection, and supporting documentation. The After Action Report will be provided to NMED no later than 90-days following completion of the proposed field activities."					

Column A: Comment Identifier Number
Column B: Source (Commenter/Authority)

Section Number of Comment

Column D: Page Number of Comment (first page associated with comment)

Column E: Paragraph number, on page, of Comment

Column F: Line Number (within Paragraph above) of Comment

Column G: Comment Classification

Column H: Comment Column I: Response

Column C:

Notes: Comments must be actionable ("add the following text:...", "delete...", "change text to:")

Place only one comment per row. Classify comment as C, M, S, or A. **Comment Classifications**

(C) Critical: Critical comments will result in a critical issue. Provide convincing support.

(M) Major: Major comments are significant concerns that may result in a major issue. This category may be used with a general statement of concern followed by a detailed comment on the specific entries in the document that, considered in total, constitute the concern.

(S) Substantive: An entry in the document that appears to be or is potentially unnecessary, misleading, incorrect, or confusing.

(A) Administrative: Administrative comments correct inconsistencies between different sections, typographical and grammatical errors.

TECHNICAL MEMORANDUM

MONITORING WELL ABANDONMENT AND INSTALLATION WORK PLAN

Revision 1.0

for

PERFORMANCE-BASED REMEDIATION CANNON AIR FORCE BASE CLOVIS, NM

Contract Number: FA8903-13-C-0008

Prepared for:





AIR FORCE CIVIL ENGINEER CENTER 2261 Hughes Ave., Suite 155 Joint Base San Antonio Lackland AFB, Texas 78236-9853

Prepared by:

FPM Remediations, Inc.

181 Kenwood Avenue Oneida, NY 13421

July 2017

Primary Purpose	This work plan describes the abandonment of three groundwater monitoring wells and the installation of six groundwater monitoring wells at two sites at Cannon Air Force Base (AFB), Clovis, New Mexico. A site location map can be found on Figure 1-1 .			
	This work is being completed for the United States Air Force Civil Engineer Center (AFCEC) under the New Mexico - Arizona Group Performance-Based Remediation Contract (Contract Number FA8903-13-C-0008).			
	During a groundwater sampling event at Cannon AFB in June 2016, monitoring wells MW-S, MW-T, and MW-U at Solid Waste Management Unit (SWMU) 113 (LF005) (as shown on Figure 1-2) could not be purged using low flow methods due to insufficient recharge. Upon further investigation, it was determined the water levels at these three wells have dropped below the bottom of their respective screens. Therefore, these wells are no longer suitable for monitoring groundwater and will be replaced.			
	Additionally, the water levels at monitoring well MW-C at LF005, as shown on Figure 1-2 , and MW-F and MW-G at SWMU 101 (SI101), as shown on Figure 1-3 , are approximately 14 feet above the top of the screen at MW-C, and 30 feet above the top of the screen at MW-F and MW-G. Therefore, clustered wells will be installed adjacent to these wells that are screened across the water table in order to detect potential contamination in groundwater that is above the current screened intervals at these wells.			
Conceptual Model	Groundwater at Cannon AFB is monitored for potential impacts from historical activities at landfills LF003, LF004, LF005, LF025, and/or sewage lagoon SI101. The six monitoring wells included in this work plan are being installed to comply with the approved landfill inspection work plan addendum (FPM/URS 2014). This work plan requires biennial groundwater sampling of 11 groundwater wells at Cannon AFB. The required monitoring wells included MW-C, MW-F, MW-G, MW-S, MW-T, and MW-U. Therefore, these replacement wells will be installed to sample the groundwater at the correct screened interval (at the soil/groundwater interface).			
Well Abandonment	Monitoring wells MW-S, MW-T, and MW-U will be abandoned due to water levels dropping below the screening depth. A review of historical data showed the 4-inch Schedule 80 wells were installed by the United States Geological Survey to depths of about 366 feet with 40-foot sumps beneath 40-foot long screens.			
	A drill rig with a 32-foot mast will be positioned next to the well such that the winch can be used to lower threaded tremie pipe to the bottom of the well. Batches of Portland cement/bentonite grout will be mixed at approximately 250 gallons at a time and pumped through the tremie pipe to the bottom of the well, filling the well from the bottom to the ground surface. After the well casing has been filled, the tremie pipe will be removed. The			

	well casing will be cutoff below grade and the surface completion (well casing, concrete pad, bollards, etc.) removed. Grout will be topped off as needed following settling of cement/grout mix. Typically, settling will occur within a 24 to 48 hour timeframe. Surface restoration may include, but is not limited to, placing topsoil within impacted areas to grade and reseeding. Daily field notes/logs will be completed in bound sequentially numbered field books and included in the report. Notes will include depth measurement, volume of cement/bentonite used to plug the well, and other field activities associated with the abandonment.			
	The monitoring well abandonment and installation activities described hereafter, will be performed in accordance with New Mexico Environment Department (NMED) Groundwater Quality Bureau Monitoring Well Construction and Abandonment Guidelines Revision 1.1, March 2011 and the Cannon AFB Resource Conservation and Recovery Act Permit requirements. Notification of all monitoring well abandonment and installations will be provided to the NMED and will include copies of either the well plugging record or well installation record and log as specified in 19.27.4 New Mexico Administrative Code (NMAC).			
Drilling Approach	Six monitoring wells will be installed using sonic drilling methods to varying depths as specified in Table 1-1 . Sonic drilling utilizes a rotary vibratory drill. The drill head is capable of rotary motion as well as oscillation. The drill bit is physically vibrated up and down in addition to being pushed down and rotated. Sonic drilling provides a continuous undisturbed core sample to allow for accurate logging of subsurface soils.			
Hydrogeologic and Geochemical Objectives	The monitoring wells are being installed as replacement wells for existing wells included in the biennial groundwater monitoring plan for landfills at Cannon AFB. Monitoring wells MW-F and MW-G evaluate potential impact from SI101 to groundwater. Monitoring wells MW-C, MW-S, MW-T, and MW-U evaluate potential impact from LF005 to groundwater.			
Potential Groundwater Occurrence and Detection	Groundwater is anticipated to be encountered at depths ranging from 316 to 340 feet below ground surface (bgs) (approximately). As the wells are replacements for existing wells, the depth to groundwater was identified during the 2016 sampling event and is included in Table 1-1 .			
Groundwater Screening and Characterization	No groundwater screening or characterization sampling is currently planned or anticipated.			
Geophysical Logging	Soil cores will be extruded into clear plastic sleeves. The borings will be sampled continuously for lithology identification by an FPM or URS geologist and recorded in boring logs using the Unified Soil Classification System.			
Well Completion	Monitoring wells are to be installed inside the sonic casing when target depth			

is reached. The well will be hung inside the casing, and filter pack will be placed by pouring sand in the casing and vibrated into place using the sonic rig. Monitoring wells are to be constructed using 4-inch inside diameter, schedule 80, flush-joint threaded polyvinyl chloride (PVC) risers. Screens will be a 0.010-inch stainless steel, wire-wrapped screen. Screen lengths for replacement wells MW-Sa, MW-Ta, and MW-Ua will be 40 feet. Screen lengths for clustered wells are 20 feet for MW-Ca and 35 feet for MW-Fa and MW-Ga. The screen lengths at MW-Sa, MW-Ta, and MW-Ua are based on the depth of water to the bottom of the Ogallala Formation. Screen placement will be based on field observations of groundwater depth during drilling. Top of screen will be placed approximately 3 feet above the water table. The screen lengths at MW-Ca, MW-Fa, and MW-Ga are based on the depth of water from the 2016 sampling event and the depth to the top of the screen in the existing wells. Surface completion will consist of a steel protective casing with locking lid and a 3-foot by 3-foot by 6-inch concrete pad set in the ground. Well construction details will be provided in a monitoring well construction log. A representative log is provided in Attachment A.

All drilling equipment used in monitoring well installation is to be decontaminated prior to use, between samples, and at completion of installation. Standard environmental decontamination methods, such as steam cleaning or Alconox-hot water wash of rods with a clean water rinse, will be employed.

Following well installations, the horizontal coordinates and elevation of the measuring point on the top of the well riser will be surveyed by a surveyor licensed in the State of New Mexico. Horizontal coordinates for all new monitoring wells will be measured to the nearest 1.0 foot and referenced to the State Plane Coordinate System. Elevations will be measured at the top of the well casing to the nearest 0.01 foot. All elevation measurements will be referenced to NAD 83. The measurement point on the top of the well casing will be clearly and permanently marked for future water level measurements. Monitoring well identification tags will be installed in accordance with applicable guidelines. The measuring point for monitoring wells shall always be the north rim of the top of casing. The measuring point should either be notched, or it should be noted that the north side of the casing is the reference point.

Well Development

The development of a newly installed monitoring well shall proceed only after the neat cement grout has been allowed to set for a minimum of 72 hours (if neat cement grout was used for the annular seal). Wells will be developed by pumping without using acids, flocculents, disinfectants, or dispersing agents. All purged water will be containerized. Well development will be completed by pumping and surging. During development, the pump inlet will be moved through the entire screened interval. The development

procedure will continue until the following conditions are met:

- Water is clear to the unaided eye, free of sand, and free of drilling fluids
- Thickness of the accumulated sediment in the well is less than 5 percent of the length of the well screen
- Temperature, pH, turbidity, and specific conductance values stabilize
- A volume of water equal to five times the volume of standing water in the well and three times any potable water added during filter pack installation has been removed from the well. One well volume will be taken to be the sum of the volume of water within the annulus assuming 30 percent porosity in the annulus, and using the height of the water column in the well at the time just prior to development.

If after 4 hours of well development the groundwater is not clear and free of sand, AFCEC will be contacted for consultation and further instructions. After final development of each well, approximately 1 liter (or 32 ounces) of water from the well will be collected in a clear glass jar, labeled, and digitally photographed. The photograph will be submitted as part of the well development log. The photograph will be a suitably back-lit close-up to show the clarity of the water.

The procedure for well development is outlined below:

- 1. All equipment that comes into contact with the monitoring well will be decontaminated before and after use by placing the equipment into a wash tub containing Alconox or low-sudsing, non-phosphate detergent along with potable water, and scrubbed with a bristle brush or similar utensil. Equipment will be rinsed with tap water in a second wash tub.
- 2. Verify that the water quality multi-meter (pH, temperature, conductivity), as well as nephelometric turbidity meter (or multi-parameter probe), and water level probe are operating properly. The electronic water quality instruments require daily calibration before use and must have the calibration verified at approximately the middle of that day's work. Calibration times and readings shall be recorded in the field log book. Specific instructions for calibrating the various water quality instruments are provided in instrument-specific instruction manuals.

- 3. Monitoring wells shall be developed using a submersible pump to flush the screen, sand pack material, and borehole wall of fine sediment resulting from well drilling and installation activities. This procedure also allows for the removal of fine sediment which may have accumulated within the well casing.
- 4. Determine the water column height in the well by measuring the well depth and the depth to water, referencing both measurements to the top of casing. Subtract the depth to water from the well depth to obtain the water column height. The volume of water in one well volume is calculated using the following equation:

4-inch well volume = water column height in well (feet) \times 0.653 gallons/foot = gallons/one well casing volume

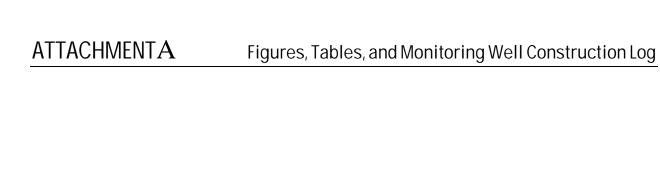
- 5. Remove a minimum of three to five well casing volumes of water during repeated surging and water removal episodes. Well surging is the process of causing water to move through the screen and into and out of the sand pack and aquifer formation. Surge the well by gently raising and lowering the bailer or pump along the entire length of well screen. Remove water from throughout the entire water column by periodically lowering and raising the pump intake or bailer. Collect the development water in drums to be stored in the lay down area until analytical testing for investigation-derived waste (IDW) is completed.
- 6. Measure and record the temperature, pH, nephelometric turbidity, and specific conductivity at the start of development and once for each well volume of water removed during development. Also observe and record the water clarity, color, and presence of odors.

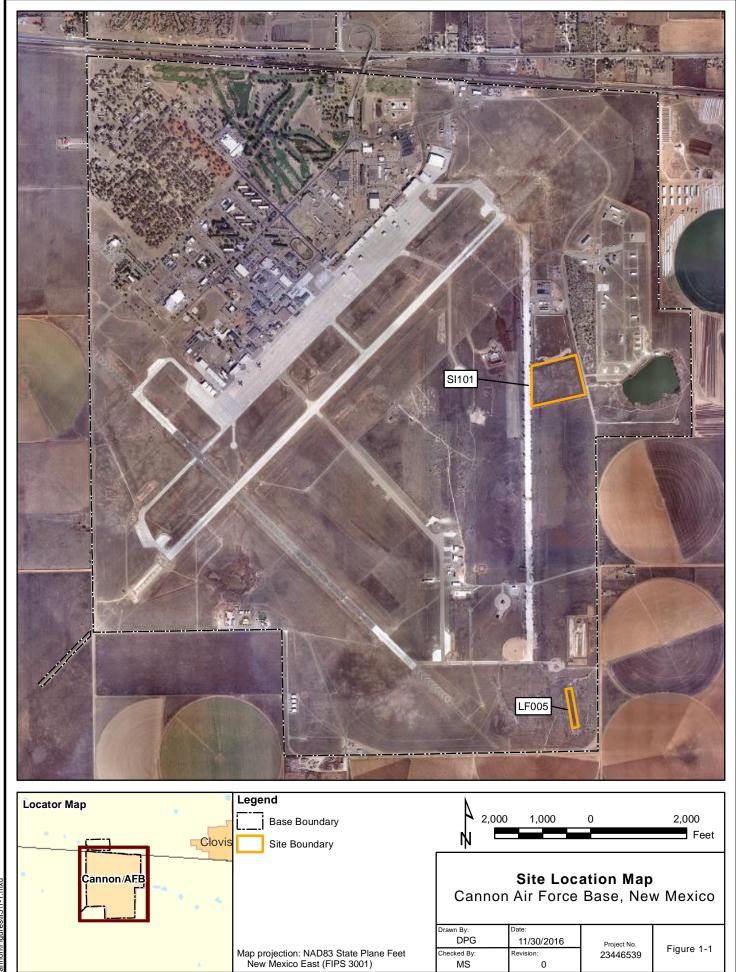
Continue to remove water and measure field parameters until three to five well casing volumes and three times any potable water added during filter pack installation have been removed, field parameters have stabilized to within 10 percent or 0.1 units for three consecutive measurements, and the water is as clear of sediment as practical. The turbidity goal during well development is less than or equal to 10 Nephelometric Turbidity Units (NTUs). However, turbidity measurements less than or equal to 50 NTUs are acceptable. Regardless of water clarity, a minimum of three to five well volumes of water shall be removed during the bailing/surging phase of well development. If the well is bailed dry, allow the water to recover and continue development.

Hydraulic

No hydraulic testing is currently planned or anticipated.

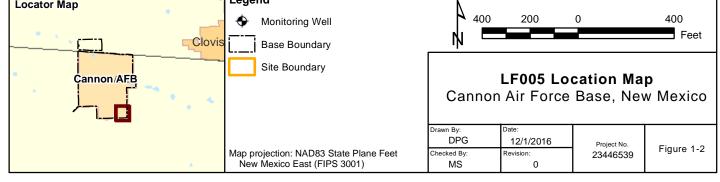
Testing and Groundwater Sampling	Groundwater samples collected will be collected from each well following development and analyzed for volatile organic compound (VOCs), target analyte list (TAL) metals (including mercury), chromium VI, perchlorate, chloride, nitrate/nitrite, sulfate, ammonia, total organic carbon (TOC), and field water quality parameters (pH, dissolved oxygen [DO], specific conductance, turbidity, and temperature). All analytical methods and sampling methods identified in the approved landfill work plan addendum (FPM/URS 2014) will be utilized.				
Investigation Derived Waste and Waste Characterization	Excess soil generated during the well installation activities will be containerized in an on-site roll-off box. A soil sample will be composited				
Reporting	The results of monitoring well abandonment, new monitoring well installation, monitoring well development, and groundwater sampling activities will be provided in a summary report that includes descriptions of all field activities, data collection, and supporting documentation. The After Action Report will be provided to NMED no later than 90-days following completion of the proposed field activities.				
Schedule	Dig permit meeting	July 27, 2017			
	Mobilization of equipment				
	Well Installation	July 31, 2017 – September 22, 2017			
	Monitoring Well Abandonment				
	Well Sampling				
References	FPM/URS 2014. Final Work Plan Addendum for Landfills and Institutional Control Inspection Sites. Cannon Air Force Base, New Mexico. June 16.				

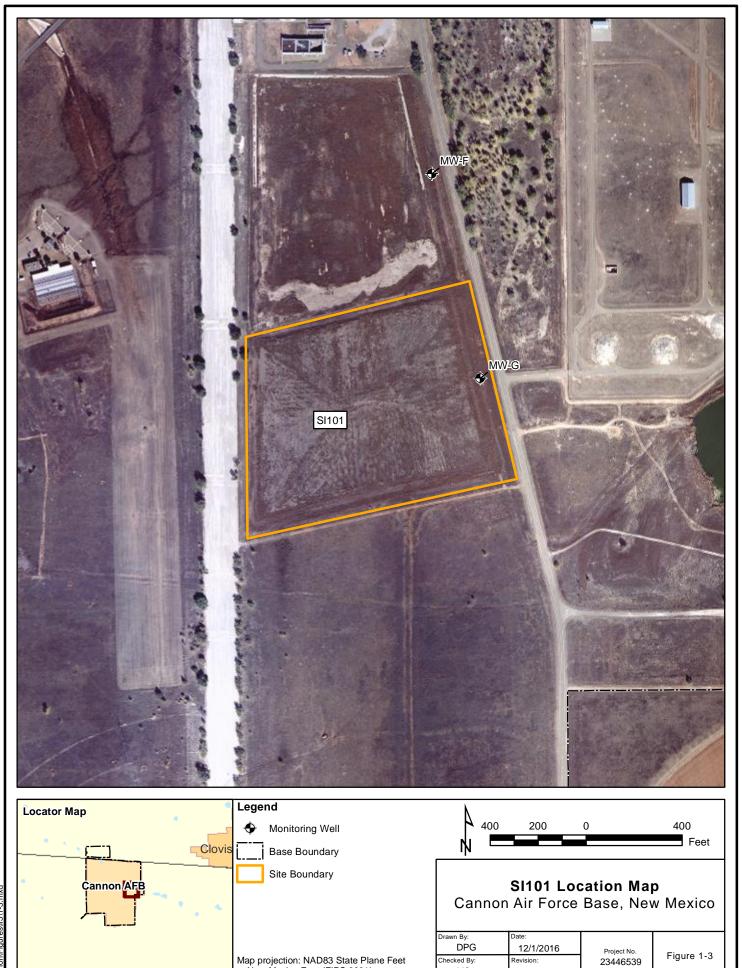




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Map projection: NAD83 State Plane Feet New Mexico East (FIPS 3001)

Checked By: MS

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Figure 1-3

TABLE 1-1 WELL ABANDONMENT AND INSTALLATION **CANNON AFB, NEW MEXICO**

Well Identification	TOC Elevation (feet amsl) (NAVD 88)	Top of Screen (feet bgs)	Bottom of Screen (feet bgs)	Screen Length (feet)	Sump Length (feet)	Bottom of Well (feet bgs)	Boring Depth (feet bgs)	April 2016 Groundwater Elevation (feet bgs)
MW-C	4268.90	346.60	361.60	15		361.60	362.00	332.26
MW-F	4280.84	349.55	364.55	15	5	369.55	375.00	316.36
MW-G	4281.55	350.90	365.90	15		365.90	372.00	320.03
MW-S	4265.75	284.87	324.87	40	40	364.87	365.00	335.06
MW-T	4265.72	284.57	324.57	40	40	364.57	365.00	340.42
MW-U	4267.30	284.14	324.14	40	40	364.14	365.00	329.42
MW-Ca ¹	TBD	327*	347	20		347.00	TBD	332.26
MW-Fa ¹	TBD	315*	350	35		350.00	TBD	316.36
MW-Ga ¹	TBD	315*	350	35		350.00	TBD	320.03
MW-Sa ²	TBD	330*	365	35		370.00	TBD	335.06
MW-Ta ²	TBD	330*	365	35		370.00	TBD	340.42
MW-Ua ²	TBD	330*	365	35		370.00	TBD	329.42

Notes:

Shaded boxes indicate well has not yet been installed. Boxes containing values are proposed depths and screen intervals.

Existing wells were measured using NAVD 88 system, however, newly installed wells will be measured using North American Datum (NAD) 83 system.

Acronyms and Abbreviations:

NAVD 88 = North American Vertical Datum of 1988

AFB = Air Force Base

TBD = to be determined

amsl = above mean sea level

bgs = below ground surface

Technical Memorandum Monitoring Well Abandonment and Installation Work Plan **Cannon AFB** FA8903-13-C-0008

¹ Indicates clustered well.

² Indicates replacement well.

^{*} Top of screen will be based on field observations of water table during drilling. Top of screen will be placed approximately 3' above top of water.

MONITORING WELL CONSTRUCTION LOG Project Name ___ Piez./Well No. Location Project No. Installed By Time Date _____ Inspected By Method of Installation Remarks AGS Elevation Type of guard posts (feet) Elevation of top of Height of riser above ground **Generalized Stratigraphy** Ground BGS Elevation I.D./Type of surface casing o (feet) Type of surface seal 0 D Depth of surface I.D./Type of riser pipe Type of backfill Depth to top of seal Type of seal Depth of top of filter pack Depth of top of screen - Type of filter I.D./Type of screen Screen slot size Depth of bottom of screen Type of backfill below observation well Depth of bottom of boring Diameter of boring

