



NEW MEXICO  
ENVIRONMENT DEPARTMENT



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**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

September 16, 2015

Mark Patterson  
FWDA, BRAC Coordinator  
P.O. Box 93  
Ravenna, OH 44266

Steve Smith  
USACE FWDA Program Manager  
CESWF-PEC-EF  
819 Taylor Street, Room 3A12  
Fort Worth, TX 76102

**RE: APPROVAL WITH MODIFICATIONS  
FINAL, GROUNDWATER PERIODIC MONITORING REPORT  
JANUARY THROUGH JUNE 2014 AND  
JULY THROUGH DECEMBER 2014  
FORT WINGATE DEPOT ACTIVITY  
MCKINLEY COUNTY, NEW MEXICO  
EPA ID# NM6213820974  
HWB-FWDA-14-006  
HWB-FWDA-15-017**

Dear Messrs. Patterson and Smith,

The New Mexico Environment Department (NMED) has reviewed both the *Final, Groundwater Periodic Monitoring Report, January through June 2014* and the *July through December 2014* (Reports), dated September 24, 2014 and April 1, 2015 respectively, for the Fort Wingate Depot Activity (Permittee). NMED hereby issues this Approval with Modifications. The Permittee must address the following comments. Please note that the comments are applicable to both Reports; however, for ease of the review and write-up NMED has only quoted the January through June 2014 Report.

**Comments:**

**1. Permittee Statement – Section 5.1.2 Nitrate and Nitrite, line 6-10, page 5-2.** “In, addition, elevated nitrate concentrations are detected in samples from background alluvial monitoring well BGMW02. Well BGMW02 is located on the FWDA boundary and up-gradient

of any SWMUs or AOCs. Therefore, the source of nitrate in this area does not appear to originate from FWDA. Figure 5-1 shows the groundwater nitrate and nitrite concentration data for the alluvial monitoring wells in the Northern Area.”

**NMED Comment:**

A demonstration must be made in order to ensure that BGMW02 and BGMW03 have not been impacted by site activities. Submit a Work Plan to propose to conduct a nitrate isotopic analysis within the nitrate plume and up-gradient from the to determine if they have been affected by site activities prior to stating there have not been impacts to these wells by site activities.

**2. NMED Comment: Figure 5-1, Spring 2014 Northern Area Nitrate and Nitrite Concentrations in Alluvial Groundwater (January through June Report).** The nitrate and nitrite values posted on this map are switched. Submit a replacement page with the corrected values.

**3. Section 5.1.5 Volatile Organic Compounds, lines 41-43, page 5-3.** “Groundwater contamination from volatile organic compounds (VOCs) at concentrations above screening levels is limited to a small number of shallow alluvial monitoring wells in the Administration Area. The detected VOCs are primarily associated with chlorinate solvents, petroleum fuels, and their degradation products. Groundwater samples were analyzed for VOCs using EPA Method SW8260B.”

**NMED Comment:**

Leaded gasoline additives 1,2-dichloroethane (1,2-DCA or EDC) and 1,2-Dibromoethane [ethylene dibromide (EDB)] are typically present at underground storage tanks or wherever leaded-gasoline was known to be used. 1,2-DCA was detected in six samples from the alluvial monitoring wells. However, EPA Method 8260 cannot detect low concentrations of EDB; therefore a determination of exceedance to the Federal Environmental Protection Agency (EPA) maximum contaminant limit (MCL) of 0.05 ug/L cannot be made. During future groundwater sampling events the Permittee must collect groundwater samples for analysis of EDB using EPA Method 8011.

The Permittee must submit the requested replacement page to address comment 2 contained in this Approval with Modification on or before **October 30, 2015**. The Permittee must also submit the Work Plan to address possible nitrate sources referenced in comment 1 on or before **February 29, 2016**.

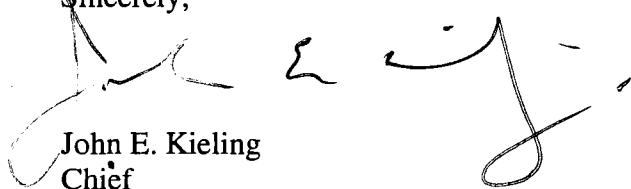
Messrs. Patterson and Smith

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If you have any questions regarding this letter, please contact Kristen VanHorn at (505) 476-6046.

Sincerely,



John E. Kieling

Chief

Hazardous Waste Bureau

cc: Dave Cobrain, NMED, HWB  
Neelam Dhawan, NMED, HWB  
Kristen Vanhorn, NMED, HWB  
Chuck Hendrickson, EPA-6PD-N  
Tony Perry, Navajo Nation  
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Clayton Seoutewa, Southwest Region BIA  
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Judith Wilson, BIA  
Eldine Stevens, BIA  
Robin White, BIA  
Christy Esler, Sundance Consulting, Inc.

File: FWDA 2015 and Reading  
FWDA-14-006 and FWDA-15-017