



DEPARTMENT OF THE ARMY
FORT WINGATE DEPOT ACTIVITY
P.O. BOX 268
FORT WINGATE, NM 87316

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November 9, 2016

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

NMED
Hazardous Waste Bureau

RE: Approval with Modifications: Final Groundwater Periodic Monitoring Report, July through December 2015, Fort Wingate Depot Activity, McKinley County, New Mexico.
EPA ID# NM6213820974, HWB-FWDA-16-004

Dear Mr. Kieling:

This letter is in reply to the New Mexico Environmental Department (NMED) Approval with Modifications letter dated September 12, 2016, reference number HWB-FWDA-16-004, regarding the Final Groundwater Periodic Monitoring Report, July through December 2015. Below are the Army's responses to the following two comments.

Comments:

1) Section 6.2 Recommendations, page 6-2, lines 27-30:

Permittee Statement:

"Re-survey the elevations of all bedrock monitoring wells. Wells were surveyed during multiple events which is believed to have introduced errors into the measured groundwater elevation data and associated groundwater potentiometric surface maps. The mapped groundwater flow directions in the bedrock aquifer conflict with the observed contaminant distributions."

NMED Comment:

The Permittee does not address the possibility that alluvial monitoring wells may also be affected by survey errors introduced by wells having been installed and surveyed during different field events. The permittee must re-survey all existing alluvial monitoring wells in addition to all bedrock monitoring wells facility-wide before the Spring 2017 sampling event. The Permittee must also provide depth corrections for all previously collected groundwater data that may be affected by survey errors or treat all data collected after the re-survey as separate from data collected before the re-survey. The Permittee must submit a completion schedule for the re-survey to NMED by November 15, 2016

Army Response:

Comment Noted/Concur: The Army has plans on resurveying all wells during the Northern Area RCRA Facility Investigation field efforts, anticipated to begin in June 2017. Although the survey will occur shortly after the Spring 2017 interim groundwater monitoring, it will still provide the necessary data to address your concerns. A revised RFI Work Plan has been submitted to NMED for your review and approval. Army plans to install additional monitoring wells. To avoid any errors generated from two separate surveys, the Army plans to resurvey

all monitoring wells (existing and new) once the installation of new monitoring wells is completed. New elevation data acquired will be compared to the historic data, and a correction for each of the existing wells will be developed.

Monitoring the wells located within and adjacent to Parcel 3 still poses a hazard due to removal activities being performed in the area. Existing wells located in Parcel 3 will be resurveyed in conjunction with the Southern Area Groundwater RFI activities, as safety protocols related to that activity will allow safe access within Parcel 3.

2) Section 6.2 Recommendations, page 6-3, lines 1-3:

Permittee Statement:

"No additional sampling for nitrate/nitrite is recommended at TMW28 because the constituents were not detected in the sample from the Fall 2015 monitoring event. These results along with the groundwater gradient data confirm that nitrate detections at BGMW02 are not associated with the FWDA nitrate plume."

NMED Comment:

NMED agrees that groundwater sample results from monitoring well TMW28 and alluvial groundwater gradient data indicate that nitrate detections in monitoring well BGMW02 are not likely to be related to FWDA activities. However, NMED required the Permittee to sample both wells for nitrates/nitrites during the 2018 groundwater monitoring activities in order to confirm that the alluvial groundwater in the vicinity of BGMW02 and TMW28 has not been impacted by FWDA activities.

Army Response:

Concur. The Army will continue periodic sampling for nitrate/nitrite at monitoring well BGMW02, and will sample for nitrate/nitrite at monitoring well TMW28 during the 2018 groundwater monitoring activities, as requested. A proposal to sample for nitrate/nitrite at TMW28 and continue periodic sampling for nitrate/nitrite at BGMW02 will be addressed in the 2018 Interim Measures Facility-Wide Groundwater Monitoring Plan.

If you have questions or require further information, please call me at (330) 358-7312.

Sincerely,

PATTERSON.MARK.C.
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Digitally signed by PATTERSON.MARK.C.1229214493
DN: c=US, o=U.S. Government, ou=DoD, ou=PKI,
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Date: 2018.11.09 16:27:00 -0500

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FWDA AR – Fort Wingate Location
FWDA AR – Ohio Location