



State of New Mexico  
ENVIRONMENT DEPARTMENT ENTERED



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**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

January 29, 2018

Mark Patterson  
BRAC Environmental Coordinator  
Fort Wingate Depot Activity  
13497 Elton Road  
North Lima, OH 44452

Steve Smith  
USACE  
CESWF-PER-DD  
819 Taylor Street, Room 3B06  
Fort Worth, TX 76102

**RE: APPROVAL WITH MODIFICATIONS  
FINAL FORT WINGATE DEPOT ACTIVITY GROUNDWATER MONITORING  
NORTHERN AREA BACKGROUND WELL INSTALLATION LETTER WORK  
PLAN ARMY RESPONSE TO COMMENTS, NEW MEXICO ENVIRONMENT  
DEPARTMENT APPROVAL WITH MODIFICATIONS LETTER DATED  
DECEMBER 30, 2017 (HWB-FWDA-17-008)  
FORT WINGATE DEPOT ACTIVITY  
MCKINLEY COUNTY, NEW MEXICO  
EPA ID# NM6213820974  
HWB-FWDA-17-008**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *Final Fort Wingate Depot Activity Groundwater Monitoring Northern Area Background Well Installation Letter Work Plan Army Response to Comments, New Mexico Environment Department Approval with Modification Letter dated December 30, 2017 (HWB-FWDA-17-008)* (Response Letter), dated January 8, 2018. NMED has reviewed the Response Letter and hereby issues this Approval with Modifications. The Permittee must address the following comments.

**1. The Permittee's Responses to Comments 1 and 2 of the Approval with Modifications**

**Permittee Statements:** "Steel casing will be advanced continuously to total depth during drilling operations to seal off each water-bearing zone as encountered. The pull-back installation method will be used to set the well."

"Rigid PVC will be used in the well construction for groundwater monitoring wells at FWDA."

**NMED Comment:** In the Permittee's response to Comment 1, steel casing is proposed. In the Permittee's response to Comment 2, rigid PVC is proposed as a well construction material. It is not clear whether the "pull-back" installation method here refers to the telescoping method and steel casing will be retracted and PVC casing is installed afterwards. Clarify whether steel or rigid PVC is used as a well construction material and provide more detail on the proposed "pull-back" installation method in a response letter.

**2. The Permittee's Response to Comment 2 of the Approval with Modifications**

**Permittee Statement:** "Rigid PVC does not contain this additive [bis(2-ethylhexyl) phthalate]."

**NMED Comment:** If the Permittee elects to use rigid PVC as a well construction material, provide a Material Safety Data Sheet (MSDS) indicating that the PVC material contains no bis(2-ethylhexyl) phthalate or any plasticizers with the response letter. The proposed rigid PVC material must meet National Sanitary Foundation (NSF) Standard 14 type Well Casing.

**3. The Permittee's Response to Comment 2 of the Approval with Modifications**

**Permittee Statement:** "The detection of bis (2-ethylhexyl) phthalate in groundwater monitoring water samples is potentially due to flexible clear tube used to collect groundwater via low flow sampling, or as a laboratory contaminant."

**NMED Comment:** Flexible tubing manufactured without bis (2-ethylhexyl) phthalate is commercially available. In the response letter, propose to use materials that contain no bis (2-ethylhexyl) phthalate. In addition, if the source of bis (2-ethylhexyl) phthalate is attributed to laboratory contamination, reference the appropriate laboratory blank detections. The Permittee must direct the laboratory to take steps to eliminate such laboratory contamination. The Permittee may need to switch laboratories if their laboratory is unable to adequately control the contamination. Provide a measure to control laboratory contamination in the response letter.

**4. Figure 3, Schematic of Proposed Well Construction**

**NMED Comment:** Double-cased wells should be constructed for bedrock groundwater monitoring since interconnection of two or more aquifers exists and well construction may cause cross-contamination. The proposed construction in Figure 3 depicts a single-cased

well. Revise Figure 3 as necessary. If the Permittee does not believe that single-cased wells would be susceptible to cross-contamination, provide a justification in the response letter. Even though sand filter pack is segregated from the upper aquifer by bentonite seal, the aquitard that separates the saturated zones in some areas may not have sufficient thickness to prevent cross-contamination.

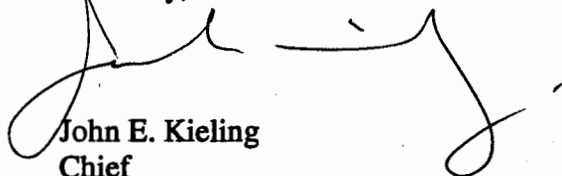
**5. The Permittee's Response to Comment 5 of the Approval with Modifications**

**NMED Comment:** NMED hereby approves the proposed analytical suite for the new bedrock background groundwater monitoring wells. Incorporate the approved sampling matrix in all future plans and reports.

The Permittee must address all comments contained in this Approval with Modifications in the future reports and work plans. A response letter must be submitted no later than **May 30, 2018**.

Should you have any questions, please contact Michiya Suzuki of my staff at (505) 476-6059.

Sincerely,



John E. Kieling  
Chief  
Hazardous Waste Bureau

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