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DAVE MARTIN
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Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 11, 2011

Colonel Stephen A. Kimball, Commander
27th Special Operations Mission Support Group
110 E. Sextant Avenue, Suite 1091
Cannon Air Force Base, New Mexico 88103

**RE: NOTICE OF DISAPPROVAL
ANNUAL GROUND WATER MONITORING REPORT
DECEMBER 2010
MELROSE AIR FORCE RANGE
EPA ID #NM5572124456
HWB-MELR-11-001**

Dear Col. Kimball:

The New Mexico Environment Department (NMED) has reviewed the Melrose Air Force Range (Permittee's) *Annual Ground Water Monitoring Report* dated December 2010 (Report). NMED hereby issues this Notice of Disapproval and provides the following comments.

Comment 1. Section 3.2.2, SWMU 115, pages 3-3 and 3-4:

The Permittee indicated that the groundwater is present approximately 25 to 30 feet below the ground surface (bgs). According to the *Draft Volume I, Phase I, RCRA Facility Investigation for Melrose Air Force Range*, dated October 1996, the ground water elevations, measured during direct push sampling, ranged between 42 and 44 feet bgs. Due to pumping from the aquifer, ground water levels in the High Plains aquifer have generally been declining over time. If the Permittee is in possession of data that indicates the ground water is 25 to 30 feet bgs in the vicinity of Solid Waste Management Unit (SWMU) 115, provide it to NMED in the revised

Report. If the Permittee has not obtained water level measurements in the vicinity of SWMU 115 since 1995, revise the statement accordingly.

Comment 2. Section 3.2, SWMU Descriptions and History, pages 3-2 through 3-7:

The Permittee summarized the histories of SWMUs 114, 115, 117, 130, 131, 132 and 133 and groundwater conditions derived from monitoring and sampling conducted in 1995 and 2000. The Permittee did not include a summary of the results of the groundwater monitoring that was conducted in 2009 and presented in the June 2009 report entitled *Initial Baseline Groundwater Monitoring, Melrose Air Force Range, New Mexico* (2009 Baseline Report). Regardless, comparison of groundwater analytical results to outdated groundwater screening levels is not appropriate. Present the historical and current analytical results in a table that references only the current screening levels for comparison.

Comment 3. Table 1. Well construction Summary:

NMED noted discrepancies in some reported well diameters and well construction materials data presented in Table 1 compared to data presented in the 2009 Baseline Report. For example, data in Table 1 indicate that MWQ-4 well casing is steel, while the 2009 Baseline Report indicates that the MWQ-4 well casing is polyvinyl chloride (PVC). Data in Table 1 indicates that the diameters of wells MWQ-18, MWQ-19, MWQ-20, MWQ-21 and MWQ-22 are 4 inches, while the 2009 Baseline Report indicates that the casing diameters in these wells are 2 inches. Data in Table 1 indicate that MWQ-8 consists of 4-inch diameter concrete material, while the 2009 Baseline Report indicates that MWQ-8 contains 6-inch diameter steel well casing. Resolve these discrepancies in the revised Report.

Comment 4. Table 1. Well construction Summary:

The Permittee indicates in Table 1 that well MWQ-8 is to be used to monitor water levels only. The 2009 Baseline Report recommended that MWQ-8 be sampled annually. Resolve the discrepancy in the revised Report.

Comment 5. Table 2. Summary of Analytical Results and Appendix A:

Table 2 contains a summary of analytical results from the October 2010 sampling event. Results of the January - March, 2010 sampling event were found in Appendix A on a CD-ROM in a document titled *Draft Report 2010, Annual Groundwater Monitoring, Melrose Air Force Range* and dated May 2010 (Draft Report). The Draft Report also includes results from the January - February, 2009 sampling event. The results in the Report and on the CD-ROM are presented in different formats making it difficult to evaluate for trends in analytical results at any single well

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through time or between wells. Revise the Report to present the data in Tables that allow for comparison of the results spatially and through time.

Comment 6. *Draft Report 2010, Annual Groundwater Monitoring, Melrose Air Force Range* and dated May 2010 (Draft Report):

The NMED has not received a report summarizing the results of the January - March, 2010 sampling event. Providing the report in draft form on a CD-ROM as an attachment is not appropriate because they should have been presented together with the results of the October, 2010 sampling event in a single report. To facilitate comparisons of data across time and between wells, present all historical and current data in water elevation/depth to water and analytical data tables (see also Comment 5 above).

Comment 7. CD-ROMs

Two CD-ROMs were included in Appendices to the Report: a draft report of the January - March, 2010 sampling event, and analytical data for the October, 2010 sampling event. The Permittee did not submit an electronic copy of the Report itself. Include an electronic copy of the Report.

The Permittee must submit a revised Report to NMED that addresses all of the comments included in this letter no later than **June 30, 2011**. As part of the response letter that accompanies the revised Work Plan, the Permittee must include a table that details where all revisions have been made to the revised Work Plan and that cross-references NMED's numbered comments. All submittals (including maps) must be in the form of two paper copies and one electronic copy. In addition, the submittal must include a redline-strikeout version that includes all changes and edits to the Report (electronic copy) with the response to this NOD.

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Please contact Dave Cobrain at 505-476-6055, if you have questions.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

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