



Melrose

ENTERED

DEPARTMENT OF THE AIR FORCE
27TH SPECIAL OPERATIONS MISSION SUPPORT GROUP (AFSOC)
CANNON AIR FORCE BASE NEW MEXICO

JUN 2011

Colonel Steven A. Kimball
Commander
110 E Sextant Avenue, Suite 1091
Cannon AFB NM 88103

JUN 14 2011

Mr Dave Cobrain
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Bldg 1
Santa Fe NM 87505-6063

Dear Mr Cobrain

Attached is the response to comments on the Notice of Disapproval on the Annual Groundwater Monitoring Report, December 2010, Melrose Air Force Range, for your review and approval. The responses address the discrepancies presented in a letter from Mr. James Bearzi, Chief, Hazardous Waste Bureau, New Mexico Environment Department, dated March 11, 2011.

If you have any questions regarding this submittal, please contact Mr. Ronald Lancaster, Chief, Asset Management Flight, at (575) 784-1146.

Sincerely

STEVEN A. KIMBALL, Colonel, USAF

Attachment:
Response to NOD Comments

cc:
Environmental Protection Agency, Region VI, Ms Wendy Jacques w/o Attachment

Air Commandos



**DEPARTMENT OF THE AIR FORCE
27TH SPECIAL OPERATIONS CIVIL ENGINEER SQUADRON (AFSOC)
CANNON AIR FORCE BASE NEW MEXICO**

**Response to New Mexico Environment Department Comments
December 2010 Annual Ground Water Monitoring Report
Melrose Air Force Range, New Mexico
USACE Contract No.: W9128F-10-D-0091, Task Order 006**

The New Mexico Environment Department (NMED) has reviewed the *December 2010 Annual Ground Water Monitoring Report, Melrose Air Force Range, Roosevelt and Curry Counties, New Mexico* and has issued a Notice of Disapproval (NOD) based on 7 comments. Responses to NMED's review comments are provided below.

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.

Response 1:

Page 5-17, paragraph three, second sentence of the *Phase I RCRA Facility Investigation for Melrose Air Force Range* (Foster Wheeler, 1996) states that "Groundwater is present approximately 25 to 30 ft beneath the bottom of the arroyo..." This is a citation directly from the referenced historical report. NMED is correct that the boring logs within this historical report state water levels ranged between 42 and 44 feet bgs....however these were levels collected within minutes and hours following drilling. It is unclear whether or not these levels were "stabilized at 42 and 44 feet" or whether they were still equilibrating. It is unclear in the historical report where the consultant obtained the depth to ground water stated in the text, thus NMED is correct in citing a discrepancy. At this time there are no existing monitoring wells in the vicinity of SWMU 115 and no way to verify or refute historical information. The information was cited so the reviewer knew where the information was obtained.

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.

Response 2:

The purpose of **Section 3.0** of the *December 2010 Annual Ground Water Monitoring Report* is to provide a site description and a brief history of the initial investigations that led to long term monitoring. This section of the report cites the *Initial Baseline Groundwater Monitoring, Melrose Air Force Range, New Mexico* (Foster Wheeler, 1996) and the *RCRA Facility Investigation Report Addendum* (Foster Wheeler, 2003) which reference the screening levels that were in place at the time of the investigations. Historical and current analytical results are provided and discussed in **Section 5.0** and **Section 7.0** of the report. Additionally, all available analytical results are tabulated (with comparisons made to current screening levels) with trends plotted and are provided in **Appendix D** of the report.

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.

Response 3:

During the fall 2010 Semiannual sampling event TRINITY personnel visited each well to collect a ground water elevation, observe the condition of the well, and record well construction details. The discrepancies appear to be in the 2009 Baseline Report and not in the current report; however, this was TRINITY's first time working at this site. During the spring 2011 Semiannual and Annual sampling event, TRINITY will have more time on-site and will continue to refine/correct any discrepancies between the historical table and our table to confirm the well construction details.

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.

Response 4:

Ground water elevations are provided in **Table 3** of the report. Well MWQ-8 has contained insufficient water to be sampled during the last several sampling events. In **Section 7.0** of the report and in the Recommendations (**Section 9.0**) of the report an alternative sampling location was proposed as a replacement for MWQ-8. Removal of MWQ-8 from the monitoring network was also discussed in the *Draft Report, Annual Groundwater Monitoring, Melrose Air Force Range, New Mexico, May 2010*. The proposed sampling location (MWQ-23) is depicted on the attached figure.

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 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.

Response 5:

Historical and current analytical results, including data from the Spring 2010 event, are discussed in **Section 5.0** and **Section 7.0** of the report. Additionally, all available analytical results are tabulated (with comparisons made to current screening levels) with trends plotted and are provided in **Appendix D** of the report.

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).

Response 6:

Historical and current ground water elevations, including data from the Spring 2010 event, are tabulated with trends plotted and is provided in **Table 3** of the report. Historical and current analytical results are discussed in **Section 5.0** and **Section 7.0** of the report. Additionally, all available analytical results are tabulated (with comparisons made to current screening levels) with trends plotted and are provided in **Appendix D** of the report.

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~~ Annual Report, the Permittee must include a table that details where all revisions have been made to the revised ~~Work Plan~~ Annual Report 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.

Response 6:

A CD-ROM containing an entire copy of the report was submitted with each hard copy of the report. However, an additional copy of the CD-ROM accompanies this letter. Based on direction from NMED during the 28 March 2011 teleconference to discuss these NOD comments, no revised report is required, only a letter report for Response to Comments is required.