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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 19, 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: SECOND NOTICE OF DISAPPROVAL
ANNUAL GROUND WATER MONITORING REPORT
DECEMBER 2010 (RESPONSE LETTER)
MELROSE AIR FORCE RANGE
EPA ID # NM5572124456
HWB-MELR-11-001**

Dear Col. Kimball:

The New Mexico Environment Department (NMED) has received the Melrose Air Force Range (Permittee) *Annual Ground Water Monitoring Report* (Report) dated December 2010 and the response letter dated June 14, 2011. NMED has reviewed the Report and response letter and hereby issues this Second Notice of Disapproval (Second NOD) with the following comments.

Comment 1, Section 1.0 (Introduction), page 1-2:

The Permittee lists the number of monitoring wells associated with the Semiannual SWMU Ground Water Quality Network. Revise the Report to reference the table on page 6-4 titled, *Sample Schedule*, to identify the monitoring wells located within the listed SWMUs.

Comment 2, Section 6.0 (Summary of Field Activities), page 6-1:

The Permittee states that "details associated with the Spring 2010 sampling event [are referenced in the] *Draft Report, Annual Groundwater Monitoring, Melrose Air Force Range, New Mexico*,

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May 2010 submitted by Tidewater, Inc. (Appendix A). All subsequent discussions below relating to sampling activities reference the 2010 fall sampling event conducted by TRINITY in October 2010. The analytical results associated with the Spring 2010 sampling event (Tidewater, Inc.) are discussed below in Section 8.0 Monitoring Results.” It is the responsibility of the Permittee to review previous data and information for inclusion in the Report. The Permittee must combine the information from the Spring and Fall 2010 sampling events to submit a complete Annual Groundwater Monitoring Report. Information provided in a draft form is not acceptable for a final Report. Revise the Report to include discussions of the Spring 2010 sampling activities in the appropriate sections. In addition, provide a reference for “Section 8.0 Monitoring Results” in the revised Report. Section 8.0 for this Report is titled “Conclusions.”

Comment 3, Section 6.2 (Monitoring Network Well Inspection), page 6-6:

The Permittee states that “MWQ-9 [was] a hand dug well and has purportedly caved in.” Verify if there are plans to properly abandon and replace MWQ-9 in the revised Report.

Comment 4, Section 7.0 (Monitoring Results), page 7-2:

The Permittee states that “RCRA requires unfiltered inorganic groundwater samples [and that] the WQCC regulations [require] filtered samples.” The Response to Comment 5 from the February 11, 2010 Final Work Plan NOD requires the Permittee to “analyze both total and dissolved RCRA metals [and include] total and dissolved target analyte list (TAL) metals [in] the year 2010 and every sixth year thereafter (i.e., 2016, 2022 and so on).” The Permittee must follow the requirement from the February 2010 Work Plan NOD.

Comment 5, Section 8.0 (Conclusions), page 8-2:

The Permittee states that “[t]he *Final Work Plan for Annual Groundwater Monitoring, Melrose Air Force Range* (Tidewater, 2010) specifies that perchlorate be analyzed by EPA Method SW-846 6860. Although the work plan specified this methodology, the ground water samples collected and submitted as part of the Annual Ground Water Quality sampling were analyzed for perchlorate by EPA Method 314.0 [in] 2010 by Tidewater, Inc. [and the] plan is to switch to EPA Method SW-846 6860 with the annual sampling event in 2011 and continue with this method in the future.” EPA Method SW-846 6860 should have been used to analyze the groundwater for perchlorate because it is the approved analytical method in the Work Plan. The Permittee must use EPA Method SW-846 6860 to analyze perchlorate in future monitoring events. No response required.

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Comment 6, Figure 7 (Annual Monitoring Well Network):

Figure 7 depicts the monitoring well locations for the annual monitoring well network. The symbols that define the monitoring wells are yellow and gray. The gray symbols define “water levels only or scheduled for abandonment” and the yellow symbols define “monitoring wells.” Explain this distinction in the response letter and revise the figure to separate monitoring wells as “water levels only,” “water levels only and scheduled for abandonment,” and “monitoring and sampling wells.”

Comment 7, Figures 8 (Ground Water Flow Map, 1-14-2009 to 1-16-2009) and 9 (Ground Water Flow Map, 10-24-2010 to 11-3-2010):

Figures 8 and 9 depict a site overview and report the groundwater elevations for the monitoring wells within the Range boundary for the Spring and Fall 2010 monitoring events. However, the Permittee does not provide the monitoring well designations on these figures. Revise the figure by compiling the information on one figure, identifying the monitoring wells and inserting a table on the figure that summarizes the groundwater elevations for the Spring and Fall 2010 monitoring events.

Comment 8, Table 2 (Summary of Analytical Results (10/25-10/29/2011)) and Appendix D (Parameter Summary and Trends):

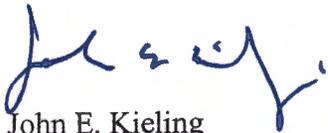
NMED’s Comment 5 from the March 11, 2011 NOD requires the Permittee to provide the results for both monitoring events in the same table. The Permittee responds that “[h]istorical and current analytical results, including data from the Spring 2010 event, are discussed in Section 5.0 and Section 7.0 of the report. Additional, analytical results are tabulated (with comparisons made to current screening levels) with trends plotted and are provided in Appendix D of the report.” The information provided in Sections 5.0 and 7.0 would be of greater use if there was one table to reference rather than looking at the individual detected contaminants presented in Appendix D. In addition, the tables and trend data presented in Appendix D are not appropriate as there is not enough information to evaluate trends from the detected constituents. The scale for each graph is not comparable and the information would be more useful if the monitoring wells were grouped by SWMUs or relevant locations. The Permittee must revise Table 2 to include the data from the Spring 2010 event.

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The Permittee must address all comments contained in this NOD and submit a revised Work Plan no later than **January 12, 2012**. The revised Work Plan must include a response letter that details where all revisions have been made, cross-referencing NMED's numbered comments. In addition, an electronic version of the revised Work Plan must be submitted that identifies where all changes have been made in red-line strikeout format.

If you have questions regarding this letter please contact Leona Tsinnajinnie of my staff at 505-476-6057.

Sincerely,



John E. Kieling
Acting Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
L. Tsinnajinnie, NMED HWB
R. Lancaster, CAFB
A. Lafuente, CAFB
K. Walker, CAFB

File: Reading and MELR 2011 and HWB-MELR-11-001