



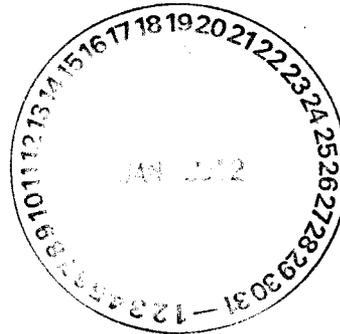
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ENTERED

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

Colonel David C. Piech
Commander
110 E Sextant Avenue Suite 1098
Cannon AFB NM 88103

Ms. Lane Andress
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East Bldg 1
Santa Fe NM 87505-6063



JAN 1 1 2012

Dear Ms. Andress

Attached are the response comments pertaining to the Second Notice of Disapproval; Annual Ground Water Monitoring Report December 2010, Melrose Air Force Range, New Mexico, for your review and approval. These responses and following revised report address comments presented in a letter from Mr. John Kieling, Acting Chief, Hazardous Waste Bureau, New Mexico Environment Department, dated August 19, 2011.

If you have any questions regarding this submittal, please contact Mr. Ronald Lancaster, Chief, Asset Management Flight, at (575) 784-1146 or Mr. Matthew Higginbotham, Restoration Program Manager at (575) 784-1092.

Sincerely

DAVID C. PIECH, Colonel, USAF

Attachment:
Response to NMED Comments

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

January 3, 2012

Mr. Matthew Higginbotham
ERP Manager
27 SOCES/CEAN
506 N DL Ingram Blvd
Cannon AFB, NM 88103-5003

**RE: Response to New Mexico Environment Department Comments
Second Notice of Disapproval (Dated August 19, 2011)
December 2010 Annual Ground Water Monitoring Report
Melrose Air Force Range, New Mexico
USACE Contract No.: W9128F-10-D-0091, Task Order 006**

Dear Mr. Higginbotham,

The New Mexico Environment Department (NMED) reviewed the *December 2010 Annual Ground Water Monitoring Report, Melrose Air Force Range, Roosevelt and Curry Counties, New Mexico* and issued a Notice of Disapproval (NOD) on March 11, 2011. The NMED review was conducted by Mr. Dave Cobrain and the NOD was signed by Mr. James P. Bearzi, Chief of the Hazardous Waste Bureau. Based on a Draft Response to Comments a conference call was conducted on March 28, 2011 to verbally discuss NMED's comments and Cannon Air Force Base (AFB) recommended responses. In attendance were personnel from NMED, Cannon AFB, Trinity Analysis & Development Corp. (TRINITY), and the US Army Corp of Engineers – Albuquerque District. The conference call was very productive and overall consensus was obtained on the draft responses. Based on the conference call it was agreed by all in attendance that a formal Response to Comments would be submitted for the NOD and that a revision to the report would not be necessary. The formal *Response to Comments for the first NOD* was submitted to Cannon AFB on March 30, 2011. Based on the call and the agreed Response to Comments, Cannon AFB, TRINITY and USACE considered this report and any potential associated issues, a closed matter and thus "finalized".

On August 19, 2011, Cannon AFB received a second NOD on the *December 2010 Annual Ground Water Monitoring Report, Melrose Air Force Range, Roosevelt and Curry Counties, New Mexico* and on the formal Response to Comments submitted on June 14, 2011 (by Cannon AFB). The second NMED review was conducted by Ms. Leona Tsinnajinnie and signed by Mr. John E. Kieling, Acting Chief of the Hazardous Waste Bureau. NMED's second NOD had eight comments, several of which were addressed in the conference call with NMED and the first response to comments.

Responses to NMED's August 19, 2011 NOD comments are provided below.

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.

Response 1:

Acknowledged, the report has been revised to reference the table on page 6-4.

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, 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."

Response 2:

Historical and current analytical results are reviewed 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 Parameter Summary and Trends" of the report. All available previous data and information was included in this report. As TRINITY was not the author of the "Draft Report, Annual Groundwater Monitoring, Melrose Air Force Range, New Mexico, May 2010, Tidewater, Inc." we are not in a position to, nor contractually funded to revise Tidewater's report. There was evidently a contractual glitch with Tidewater, Inc. completing the final report, however TRINITY attempted to overcome this by including their data and pulling forward historical data, that was heretofore not compiled in one document and thus setting the stage for defensible "trend analysis" in the future.

The reference to "Section 8.0 Monitoring Results" that appears on page 6-1 is incorrect. It should have referenced "Section 7.0 Monitoring Results". This has been corrected

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.

Response 3:

The hand dug well MWQ-9 is not currently part of the permitted ground water quality monitoring network, since it is dry and thus does not need to be replaced. Abandonment of MWQ-9 was discussed with Cannon AFB however they are currently evaluating the well for

“cultural asset inclusion”. In addition, the New Mexico Office of State Engineers was contacted and they have no requirements to abandon this type of well.

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.

Response 4:

All samples collected by TRINITY and Tidewater, Inc. in 2010 were analyzed for total and dissolved metals as indicated by results provided in Table 2 and Appendix D. A revised Work Plan has been submitted to NMED for review. The Work Plan incorporated this NOD requirement and specifies the collection of total and dissolved metals. In addition, based on previous comments from NMED citing the lack of trends in the historic data, TRINITY felt it was prudent to recommend metals (total and dissolved) be included in the SWMU Ground Water Quality Network and from the Annual – Ground Water Quality Network, for the foreseeable future to establish defensible trend data.

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 SW846 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.

Response 5:

Noted. No response required.

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."

Response 6:

Acknowledged, Figure 7 has been updated with the requested changes.

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.

Response 7:

Figure 8 and Figure 9 represent separate distinct interpretations of the ground water flow regime. Each figure relies on a separate and complete round of water levels. It is not possible to compile the information on one figure. However, Figure 8 and Figure 9 have been revised to identify the monitoring wells and a table has been inserted on each figure summarizing the ground water elevations.

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.

Response 8:

Noted. The "Table 2 Summary of Analytical Results" will include the two sampling events conducted within the report year. TRINITY understands that there is currently insufficient data for proper trend analysis and we state this in the report. However, on behalf of Cannon AFB and to support NMED, TRINITY has pulled all available historical data into one location so that we can build on this data in the future.

In addition, the format of the tables providing analytical results and trends were discussed during the conference call that took place on March 28, 2011. During the conference call all parties, including Mr. David Cobrain and Ms. Hope Monzegilo with NMED, agreed that the format in which TRINITY submitted the data was more than adequate for proper data review and interpretation.

Upon approval of the above response to comments TRINITY will be more than pleased to revise and reprint the *December 2010 Annual Ground Water Monitoring Report, Melrose Air*

Force Range, Roosevelt and Curry Counties, New Mexico. If you have any questions or need further assistance, please do not hesitate to contact me at 850-613-6800.

Respectfully,

TRINITY Analysis & Development Corp.

A handwritten signature in cursive script, appearing to read "Richard L. Burdine".

Richard L. Burdine
Senior Vice President