



SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.nmenv.state.nm.us



DAVE MARTIN
Secretary

BUTCH TONGATE
Deputy Secretary

JAMES H. DAVIS, Ph.D
Director
Resource Protection Division

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 10, 2012

Colonel David C. Piech
27th Special Operations Mission Support Group
110 E. Sextant Avenue, Building 600, Suite 1098
Cannon Air Force Base, New Mexico 88103

**RE: DISAPPROVAL
ANNUAL GROUND WATER MONITORING REPORT
DECEMBER 2010
MELROSE AIR FORCE RANGE
EPA ID # NM7572124454
HWB-MELR-11-001**

Dear Col. Piech:

The New Mexico Environment Department (NMED) has received the *Annual Ground Water Monitoring Report, December 2010* (Report) dated January 27, 2011. NMED has reviewed the Report and hereby issues this Disapproval with the following comments. No further revisions are necessary to this Report; however, all comments in this letter must be addressed in the 2012 Annual Ground Water Monitoring Report and in all future groundwater monitoring reports submitted to NMED.

Comment 1

On October 27, 2009 NMED issued a letter to Melrose Air Force Range (MELR) (through Cannon Air Force Range [CAFB]) outlining requirements for future ground water monitoring reports at MELR and also issued two Notice's of Disapproval (NODs) dated March 11, 2011 and August 19, 2011, respectively, for the Report. These three letters outlined necessary changes to

the presentation of newly acquired data, historical data, well construction details, the sampling analytical suite for metals, and the required sampling schedule in future metals for ground water monitoring reports. The Permittee must incorporate comments included in NMED correspondence in the 2012 ground water monitoring report (GWMR) and in all future ground water monitoring reports and work plans. The Permittee is directed to use the NMED Position Paper *General Reporting Requirements for Routine Groundwater Monitoring Activities at RCRA Sites*, February 14, 2003 as a guideline for all future ground water monitoring reports. A copy of this paper can be found on NMEDs website at this link:

http://www.nmenv.state.nm.us/HWB/data/General_Reporting_Requirements_for%20Routine_GW_Monitoring.pdf

Comment 2

Comments made by NMED in previous NOD letters dated March 11, 2011 (first NOD) and August 19, 2011(second NOD) were not addressed as indicated by the Permittee in the response to comments letters dated June 14, 2011 and January 3, 2012, respectively. In addition, comments made by NMED in the NOD letters were applied to the 2011 groundwater monitoring report or the 2012 ground water monitoring work plan. The Permittee must incorporate NMED's comments into document submittals consistently through time to remain in compliance at the MELR.

Comment 3

In the first NOD, Comment 3/Response #3 the Permittee was instructed to resolve the discrepancies in Table 1 (Well Construction Summary). The Permittee's response to Comment 3 states "[d]uring the spring 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." This table was not modified and was resubmitted unchanged with the revised 2010 GWMR, the 2011 GWMR and the 2012 ground water monitoring work plan (GWM WP). The well construction details table must be verified and updated accordingly in the 2012 GWMR.

Comment 4

Both the first NOD, Comment/Response #5 and the second NOD, Comment/Response #8 refer to presenting historical data on one table. The Permittee's response to the second NOD, comment 8 states "[t]he *Table 2 Summary of Analytical Results*" will include the two sampling events conducted within the report year." This is not sufficient. Include a historic data table for analytical results in the revised Report and all future reports. The historic data table summarizing previous analytical results must include a minimum of eight ground water sampling events (four years). It is understood that at Melrose Air force Range, the 2009 baseline ground water monitoring event may be the earliest reliable data for the starting point for the historical tables, this is acceptable.

Comment 5

In the first NOD Comment/Response #6, NMED states "...[t]o facilitate comparisons of data across time and between wells, present all historical and current data in water elevation/depth to

water analytical data tables...” The Permittee’s response to Comment 6 states “[h]istorical and current ground water elevations...[are] provided in **Table 3** of the report.” There are two tables labeled ‘Table 3 Ground Water Levels’ in the Report. The first Table 3 contains several blank cells, it is not clear whether this indicates that a ground water measurement was not obtained, and if so, why no measurement was made. Depth to water measurements must be collected in all accessible wells during each sampling event and included in all future ground water monitoring reports. The second Table 3 contains up to 28 small graphs (0.75 inch by 2.5 inch each) per page; each graph plots historical groundwater elevation for an individual well. Not all vertical axes are equal, therefore making comparisons of data across time and between wells is difficult.

Comment 6

The second NOD Comment/Response # 3 asks the Permittee to “[v]erify if there are plans to properly abandon and replace MWQ-9 in the revised Report.” The Permittee’s response to comment 3 states that “[t]he hand dug well MWQ-9 is not currently part of the permitted ground water quality monitoring network, since it is dry...[a]bandonment of MWQ-9 was discussed with Cannon [Air Force Base] AFB however they are currently evaluating the well for “cultural asset inclusion”...the New Mexico Office of State Engineers...have no requirements to abandon this type of well.” MWQ-9 is currently included in the monitoring well network (for water level only) in the 2012 ground water monitoring work plan. It is unclear if this well is slated for abandonment or “cultural asset inclusion”, furthermore, a definition of “cultural asset inclusion” has not been provided in the Report, or subsequent document submittals to NMED.

Comment 7

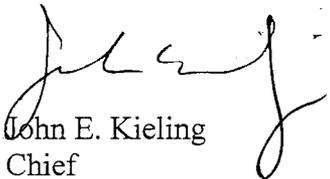
The second NOD Comment/Response # 4 states that RCRA regulations require the collection of total metals. Comment 5 from the *Final Work Plan NOD* dated February 11, 2010, instructed the Permittee to “analyze both total and dissolved RCRA metals [and include] total and dissolved (TAL) metals [in] the year 2010 and every sixth year thereafter (i.e., 2016, 2022 and so on).” This was reiterated in Comment 4 from the August 19, 2011 Second NOD. Because total and dissolved metals were collected as required in 2010 and collected without requirement in 2011 the Permittee is not required to collect samples for dissolved metals until 2016; however, analyses for total metals must be conducted annually.

Col. Piech
October 10, 2012
Page 4 of 4

No response or revision of the Report is necessary, however the Permittee must incorporate comments contained in this Disapproval in all future ground water monitoring report and work plan submittals to NMED to avoid future disapprovals or rejections. In the event a report or work plan is rejected, rather than approved, disapproved or approved with modifications, NMED will issue another fee invoice upon receipt of the re-submitted report.

If you have any questions regarding this letter, please contact Lane Address of my staff at (505) 476-6059.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: J. Valdez, NMED HWB
D. Cobrain, NMED HWB
N. Dhawan, NMED HWB
L. Address, NMED HWB
M. Higginbotham, CAFB
R. Lancaster, CAFB
L. King, EPA 6PD-N

File: MELR 2012 and Reading
HWB-MELR-11-001