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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 16, 2015

Heather L. Buono, Colonel
Commander, 27th Special Operations Mission Support Group
27 SOMSG/CC
110 E. Alison Avenue, Suite 1098
Cannon AFB, NM 88103

**RE: DISAPPROVAL
GROUNDWATER MONITORING FIELD SAMPLING PLAN
MELROSE AIR FORCE RANGE, NEW MEXICO
EPA ID # NM7572124454
HWB-MELR-14-001**

Dear Col. Buono:

The New Mexico Environment Department (NMED) has received the Melrose Air Force Range (Permittee) *Groundwater Monitoring Field Sampling Plan, Melrose Air Force Range, Roosevelt and Curry Counties, New Mexico* (GWFSF) dated October 2014. NMED has reviewed the GWFSF and hereby issues this Disapproval with the following comments.

Section 1.2, Site Description and History, page 1-2

1. The SWMUs are listed rather than described in this section, with the exception of Site ST-506. Include brief descriptions of all SWMUs and include designations for all monitoring wells associated with each SWMU. Include a figure depicting all of the SWMUs.

Section 1.3, Project Description Objective, page 1-3

2. There are a number of wells at the Facility that are not included in the monitoring plan. Some of these wells have been plugged and abandoned; others have been used in previous monitoring events but for various reasons will not be sampled under the current monitoring work plan. These wells include MWL-1, MWL-2, MWL-3, MWQ-4, MWQ-5, MWQ-6, MWQ-7, MWQ-10, MWQ-11, MWQ-23, M117MW-001 through -004, MA02MW001S, and MA03MW001. Describe all wells at the facility, and list the reason(s) why each of the wells

is not included in the work plan; this may be presented in the form of a table, if desired. Add all wells to Figure 1-2. Existing wells that will not be sampled must be identified using a different color or symbol than wells that will be sampled or wells that have been plugged and abandoned.

Section 1.4, Geology/Hydrogeology, Page 1-3

3. The Permittee must include a localized potentiometric surface map showing groundwater flow direction and groundwater elevations in each well from the most recent sampling event.

Section 2.1, Water Level Measurements, Page 2-1

4. The Permittee states, "The depth to groundwater will be measured from the top of well casing to the nearest 0.01 foot and always from the same reference point or survey mark on the well casing. If there is no reference mark, the measurement will be from the north side of the casing." The Permittee must collect all measurements from the highest point on the well casing rather than the north side if there is no reference mark. Revise the GWFSR accordingly. A similar comment was acknowledged by the Permittee in the response to NMED comments to the May 2011 work plan.
5. Section 2.1 has no description of the proposed method to collect groundwater level measurements from wells containing dedicated pumps. Table 1-1 indicates that all wells on the groundwater sampling list have dedicated bladder pumps, and that several of the wells on the "water level only" list may contain a pump, as they are listed as unknown. Additionally, it is not clear whether the wells used only for water level measurements are accessible for that purpose, and whether they are closed, locked, or otherwise protected from damage. Describe the accessibility of each well and how water levels will be measured in wells containing dedicated pumps.

Section 2.3.1, Sample Containers and Preservation Techniques, Page 2-3

6. Table 2-3 states that unpreserved Nitrite/Nitrate samples have a holding time of 48 hours. Describe how time constraints will be managed in order to allow the lab enough time to perform a Nitrite/Nitrate analysis within the holding time. If the short holding time requirement cannot be met, the Permittee could propose to add sulfuric acid as a preservative to extend the holding time.

Table 1-1

7. In Table 1-1, ensure consistency of significant digits throughout the table, including for the Easting, Northing, Top of Casing, and Ground Surface columns.
8. In Table 1-1, the Pump column has "DSP" for MWL-8, which is undefined. If this is a typo, correct it; otherwise, define DSP.
9. In Table 1-1, NMED is assuming the notation "bls" means below land surface; however, it must be defined.

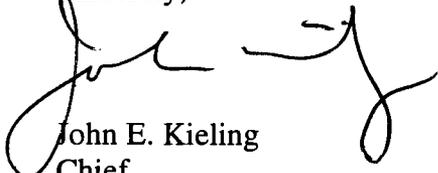
Appendix A, Field Forms

10. In Appendix A, Groundwater Sampling Log, one of the field parameters listed is Salinity ‰. Either explain how this parameter will be measured, remove this column from the form, or explain that salinity will not be measured and that the column will be left blank.
11. In Appendix A, Groundwater Sampling Log, Depth to Water is in the fifth column. Explain how depth to water will be measured during well purging.

A revised groundwater monitoring Work Plan that corrects all of the deficiencies noted in this Disapproval must be submitted to NMED no later than **April 16, 2015**. The revised Work Plan must be accompanied by a response letter that details where the Disapproval comments were addressed that cross-references NMED's numbered comments. The Permittee must also submit an electronic redline-strikeout version of the Work Plan that shows where all changes were made to the Work Plan.

If you have any questions regarding this letter, please contact Naomi Davidson at (505) 476-6022.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: N. Davidson, NMED HWB
N. Dhawan, NMED HWB
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File: MELR 2014 and Reading, Groundwater Monitoring Field Sampling Plan