



Melrose ENVIRONMENT

NEW MEXICO  
ENVIRONMENT DEPARTMENT



*Hazardous Waste Bureau*

**MICHELLE LUJAN GRISHAM**  
Governor

2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6313

**JAMES C. KENNEY**  
Cabinet Secretary Designate

**HOWIE C. MORALES**  
Lt. Governor

Phone (505) 476-6000 Fax (505) 476-6030

[www.env.nm.gov](http://www.env.nm.gov)

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

February 6, 2019

Colonel Stewart A. Hammons  
Commander, 27th Special Operations Wing  
110 E. Alison Avenue, Suite 1098  
Cannon Air Force Base  
New Mexico 88103

**RE: SECOND DISAPPROVAL  
[2016] ANNUAL GROUNDWATER MONITORING REPORT, [REVISION 1]  
MELROSE AIR FORCE RANGE  
EPA ID# NM5572124456  
HWB-MELR-17-001**

Dear Colonel Hammons:

The New Mexico Environment Department (NMED) has received the U.S. Air Force [2016] *Annual Groundwater Monitoring Report, [Revision 1], Melrose Air Force Range (Report)*, submitted on behalf of Melrose Air Force Range dated January 26, 2018. NMED has reviewed the Report and hereby issues this Disapproval. The Permittee must address the following comments.

**GENERAL COMMENTS**

**1. Report Title**

**NMED Comment:** The title of the Report must specify the year of the groundwater monitoring period reported and specify the Report revision number. Revise the Report title accordingly.

## 2. Report Submittal Consistency

**NMED Comment:** The Report hard copy, electronic version, and redline-strikeout version of the Report are not the same. Ensure all submitted versions of the revised Report are the same. Revise the Report versions to match.

## 3. Report Redline Strikeout Version (RLSO)

**NMED Comment:** All revisions that were made to the Report were not identified in the RLSO. The RLSO must identify all revisions made to the previous version of the Report. Failure to provide an accurate RLSO slows review and creates the potential for changes to be overlooked. Ensure that the RLSO provided with the revised Report accurately tracks all changes made to the Report.

## 4. General Report Issues, Inaccuracies, and Discrepancies

**NMED Comment:** The Report contains multiple issues, inaccuracies, and discrepancies which must be addressed as follows:

- a. **NMED Comments and Response Matrix (Permittee Response Matrix) Comment 5:** The Permittee's response to NMED Comment 5 of the October 20, 2017 *Disapproval 2016 Annual Groundwater Monitoring Report* (Disapproval) provided in the Report hard copy states, "concentration units for all tables and figures have been revised from mg/L to g/L [grams per liter], where possible, for consistency." Most Report tables and figures in the Report provide concentration data in micrograms per liter ( $\mu\text{g/L}$ ). The same discrepancy was noted in Response Matrix Comments 8c and 9 of the hard copy Report. The concentration unit discrepancy (grams per liter) has been identified throughout the Report provided to NMED for review. The accompanying electronic version of the Report and appendices do not correlate with the hard copy. Thoroughly review and revise the Report for accuracy and consistency. Ensure all units in the hard copy and electronic version of the Report, including data in appendices, are consistent and accurate. Ensure that the hard copy and electronic version of the revised Report are identical. Revise the Report versions to match.
- b. **Executive Summary, Page 6:** The Permittee states, "[t]he well locations are shown in Figure 1-2 on page 12 of this report and 1-3 on page 14 of this report." Figures 1-2 and 1-3 are provided on pages 11 and 13 of the Report, respectively. The same page number discrepancies were noted in Section 1.2, Site Description and History, Section 1.2.1, SWMU Description and History, and Section 1.3., Project Description Objective. Revise the Report to correct the discrepancies.
- c. **Executive Summary, Page 6:** The Permittee states, "Table 1 on Page 19 of this report lists the well properties and details." Table 1 is provided on page 18. Additionally, page 19 of the Report is missing. The Table 1 page reference discrepancy was also noted in Section 1.3, Section 3.2, Groundwater Elevation Collection, and Section 3.3, Field

Parameters and Equipment. Resolve the discrepancies in the revised Report.

- d. **Sections 4.2.1, SWMU-114, 4.2.2, SWMU-130, and 4.2.3, SWMU-131, Page 32:** The Permittee states, “[t]hese analytes concentrations have traditionally been above NMAC [New Mexico Administrative Code] 20.6.3103.” The correct NMAC screening level section citation is 20.6.2.3103 NMAC. Revise the Report accordingly.
- e. **Report Tables, Figure, and Chart Concentration Data and Units:** All chemical of concern concentration data and corresponding units reported in the revised Report must be clearly, consistently, and accurately presented throughout the Report. Revise the Report accordingly.
- f. **Appendix B, Tables and Charts, Table 4b, Historical Dissolved Oxygen:** Table 4b is presented twice in Appendix B of the Report. Additionally, the Historical Dissolved Oxygen chart for all monitoring wells combined following Table 4b indicates the chart concentrations are reported in milligrams per liter. Table 4b and concentration charts for each individual monitoring well indicate the concentration units are reported in micrograms per liter. For consistency with prior reporting and collected field data, dissolved oxygen concentrations must be reported in milligrams per liter. Revise Table 4b and supporting charts accordingly.
- g. **Appendix B, Tables and Charts, Tables 4a, 4b, 4c, 4d, and 4e:** Although the concentration units for the reported values are provided at the bottom left hand portion of the table pages, revise Tables 4a, 4b, 4c, 4d, and 4e to include concentration units in each table notes box (noted as “Blank-No data” for each table) where it will be readily visible. Ensure data and unit consistency between the tables and corresponding charts information. Revise the Report accordingly.

## 5. Permittee Response Matrix Comment 1

**NMED Comment:** As clarification to NMED’s Comment 1 of the Disapproval, figures and tables should have either been included at the end of each subdivided Report section in support of the section discussion, or alternatively, as appropriate, in Appendix A, Figures, or Appendix B, Tables and Charts, of the revised Report.

As additional clarification, the following changes must be made to the revised Report:

- a. Figure 1-1 MAFR [Melrose Air Force Range] Location Map, Figure 1-2: Monitoring Well Network Map, and Figure 1-3: SWMU Map, included in Section 1.0, Introduction, must be moved to Appendix A: Figures. The Figures must be referenced in all corresponding Report section discussions. Revise the Report accordingly.
- b. Table 1: Well Construction Data, must be moved to Appendix B, Tables and Charts, and referenced in the Report where the table information is discussed. Revise the Report accordingly.

- c. Figures 2-1, 2-2, 2-3, 2-4, 3-1, 3-2, and 3-3 are only discussed in Section 4.0, Results. As noted for Figures 1-1, 1-2, and 1-3 discussed in Section 1.0, Introduction, all figures referenced in each section must be numbered to correlate with the section in which the figures are discussed. In the case of Figures 2-1, 2-2, 2-3, 2-4, 3-1, 3-2, and 3-3, the figures should have been numbered to reference Section 4.0. As an example, Figure 2-1, Chinle Groundwater Flow Map, which is only discussed in Section 4.0 of the Report, should have been numbered Figure 4-1. Revise the Report figure numbers to reference the corresponding section where the information is discussed.
- d. Figure 2-5, Water Level Map April 2016, and Figure 2-6, Water Level Map October 2016, are not referenced in any part of the Report other than the Table of Contents. Figures 2-5 and 2-6 information must be discussed and appropriately numbered and referenced in the revised Report.
- e. Information provided in Tables A1 through A19 must either be included in the revised Report as a discussion in each respective section where information was provided in a table format or, if more appropriate based on table content, moved to Appendix B: Tables and Charts of the revised Report. Any table moved to Appendix B must be sequentially numbered in a logical manner with respect to the section the table information supports. All Appendix B tables must be appropriately referenced where the table information is discussed in the revised Report. Revise the Report accordingly.
- f. Ensure all tables and figures are logically labeled and numbered and appropriately and accurately referenced in all corresponding sections of the revised Report.

## 6. Permittee Response Matrix Comment 2

**NMED Comment:** NMED Comment 2 of the Disapproval states, “[p]rovide any waste disposal manifest documentation as an additional appendix to the Report.” An additional appendix that provides waste disposal manifest documentation was not included in the Report for the 2016 groundwater monitoring period. NMED also required additional information regarding the disposal of the collected purge and decontamination water in the Report revision. Additional detail was provided in the Report regarding the storage of the Investigation Derived Waste (IDW) generated during the spring and fall events in Section 2.3, Investigation Derived Waste. However, no clear information was provided regarding actual IDW disposal. The revised Report must explain what happened to the remaining liquid in the 100-gallon tank in the revised Report. As previously requested, include waste disposal documentation in the revised Report as an additional appendix or provide complete details regarding the regular IDW collection, disposal, and manifesting procedures in the revised Report.

#### 7. Permittee Response Matrix Comments 4 and 5

**Permittee Statement:** “The revisions to the table in section 4.2.3 have been completed as requested. As per requested vinyl chloride has been compared to NMAC 20.6.2.3103 and report section revised.”

**NMED Comment:** The Section 4.2.3 table pertaining to vinyl chloride and the discussion was deleted from the Report. As previously directed, the revised Report must include a discussion regarding any detections of vinyl chloride and the comparison of reported concentrations to the appropriate screening level as specified in the Disapproval. In addition, the deletion of the vinyl chloride discussion was not identified during review of the RLSO version of the Report. The RLSO version of the Report must identify all revisions that were made to the previous version of the Report. Revise the Report accordingly.

#### 8. Permittee Response Matrix Comment 6

**Permittee Statement:** “The hold time exceedance for the hexavalent chromium sample from MWQ24 has been addressed per NMED request in section 4.2.6.”

**NMED Comment:** Section 4.2.6 was not included in the Report. Reference appropriate sections of the Report where NMED’s comment was addressed or include the missing section in the revised Report.

#### 9. Response Matrix Comment 8b

**Permittee Statement:** “The most recent EPA [Environmental Protection Agency] MCLs [Maximum Contaminant Levels] are presented in the results tables.”

**NMED Comment:** For clarification, the original Table 5a and 5b reference to the 2009 MCLs suggested the listed screening levels in the tables were outdated and not appropriate for the screening level evaluation documented in the tables. The most current MCLs available at the time the original February 21, 2017 Report was submitted to NMED for review were issued by the EPA in 2016, or at the latest, early 2017. However, in response to NMED’s comment, the Permittee revised the tables to present the most recent January 2018 EPA MCLs. This was not the correct interpretation of the comment provided by NMED. However, for consistency with the update of the MCLs in the Report, also update the NMED tap water screening levels to the most recent screening levels provided in Table A-1 of NMED’s 2017 Risk Assessment Guidance for Site Investigations and Remediation. Revise the Report accordingly.

#### 10. Response Matrix Comment 8e

**Permittee Statement:** “[t]he New Mexico WQCC [Water Quality Control Commission] groundwater standard for chromium has been applied to the tables [Tables 5a and 5b] as requested.”

**NMED Comment:** The Permittee revised the Report to reflect the screening of hexavalent chromium with the New Mexico WQCC groundwater standard; however, a discussion of the screening level evaluation of hexavalent chromium was not provided. The revised Report must include a discussion of the hexavalent chromium screening evaluation. Revise the Report accordingly.

#### 11. Permittee Response Matrix Comment 9

**Permittee Statement:** “Concentration units for all tables and figures have been revised from mg/L to g/L, where possible, for consistency.”

**NMED Comment:** A concentration unit discrepancy identified in Tables 6a through 6z Table Notes (i.e., concentrations units noted as grams per liter) of the original February 21, 2017 Report is also present in this Report. The noted concentration unit discrepancy appears to have been carried over to Tables 6a through 6aa and supporting data charts in the hard copy of this Report. Ensure the revised Report hard copy consistently presents units and concentration data in micrograms per liter for these tables and supporting data charts to match the units and concentration data provided in the electronic version of the Report. The Permittee must ensure specified unit and corresponding concentration data accuracy and consistency for all Report information, tables, charts, and figures provided in the hard copy and electronic version of the revised Report. Revise the Report accordingly.

#### 12. Reporting of Volatile Organic Compounds Concentration Data

**NMED Comments:** Review of volatile organic compounds (VOCs) groundwater sample data provided in Appendix C, Analytical Laboratory Reports indicates groundwater concentration data was reported for only a limited suite of compounds from the full analyte list for Environmental Protection Agency (EPA) Method 8260B. Provide clarification for why sample analysis results for only the VOCs acetone, benzene, chloroform, chloromethane, 1,2-dichloroethane, ethylbenzene, 4-methyl-2-pentanone, methylene chloride, toluene, 1,2,4-trimethylbenzene, vinyl chloride, and xylene were reported instead of the full suite of Method 8260B VOCs reported during prior sampling events at Melrose Air Force Range. Groundwater samples collected for VOC analysis must always be analyzed for the full suite of chemicals of concern (COCs), which must be included in the laboratory reports provided with the Report.

## **SPECIFIC COMMENTS**

### **13. Section 1.1, Project Background, Page 9**

**Permittee Statement:** “During the groundwater investigations, up to five distinct water bearing zones were identified beneath MAFR. None of these appeared to correlate with the regional Ogallala Aquifer.”

**NMED Comment:** Provide information regarding the water bearing zones (e.g., lateral distribution and depths). Explain why the water bearing zones do not correlate with the Ogallala Aquifer in the revised Report.

### **14. Section 1.2.1, SWMU Description and History, SWMU-114 – Expended Ordnance and Industrial Waste Burial Site, Page 14**

**Permittee Statement:** “Elevated metals concentrations were attributed to high turbidity and natural conditions. Elevated anion concentrations were attributed to natural conditions.”

**NMED Comment:** Appendix B, Table 4e, Historical Turbidity, indicates that turbidity readings decreased following initial sampling of the SWMU 114 monitoring wells. Clarify the statement in the revised Report. In addition, perchlorate (one of the detected anions) may be attributable to past and ongoing range activities. Provide additional lines of evidence to support the statement for anions. Revise the Report accordingly.

### **15. Section 1.3.1, Inactive Wells, Page 20**

**Permittee Statement:** “There are several wells located on MAFR that were included in previous monitoring plans. These wells are abandoned, inaccessible, or inactive and not included in the FSP [Field Sampling Plan]. These well locations are shown on Figures 1-2 and 1-3 on page 12 and 14 of this report. These wells are listed in Table A7 below.”

**NMED Comment:** Table A7, Monitoring Wells No Longer in the FSP, lists eleven wells. However, Figure 1-2 identifies additional inactive wells that are not included in Table A7 (i.e., monitoring wells MWQ-3, 4, 5, 6, 7, 9, 10, 11, 23, and MWL-1). Provide clarification for why these wells are not addressed in the section information, as necessary, include information for all wells identified as inactive or abandoned in the revised section information. Revise the Report accordingly.

**16. Section 1.4.1, Groundwater Elevation, Gradient, and Flow Velocity, Page 21**

**Permittee Statement:** “Some wells (MWQ-2, MWQ-19, MWQ-20, and MAO2MW001D) penetrate deeply into the Chinle (50-120 feet). Water levels in these wells are 15 to 55 feet above the Ogallala/Chinle contact, indicating that the aquifer is confined.”

**NMED Comment:** The screened interval of some wells (M114MW001, M114MW002, M114MW003, M114MW004/MWQ-16, MAO1MW002, MWQ-18 and MWQ-22) are submerged below the water table according to Appendix B, Table 2a. Wells with submerged screened intervals are not appropriate for monitoring constituents that accumulate at the interface. Unless these wells are installed in confined aquifers, the screened intervals must be partially screened across the groundwater table interface. For example, well MWQ-18 was installed in the Ogallala formation, an unconfined aquifer. Clarify why the monitoring well screens were completely submerged at these wells and discuss the appropriateness of the screened intervals in the revised Report.

**17. Figure 1-4, Topographic Map of MAFR, Page 22**

**NMED Comment:** The elevation values shown in Figure 1-4 are not legible. Ensure all information on figures is legible in the revised Report.

**18. Section 2.0, Summary of Field Activities, Page 24**

**Permittee Statement:** “Non-disposable equipment was decontaminated in the field prior to sampling activities at each well, following the procedures described in the 2016 Baer/GMI Joint Venture Groundwater Monitoring Field Sampling Plan.”

**NMED Comment:** Reference to work plans or standard operating procedure is not sufficient. Provide detailed descriptions of field decontamination procedures actually performed in the field. Revise the Report accordingly.

**19. Section 2.1, Spring Sampling Event, Page 25**

**NMED Comment:** The Permittee states that wells MWL-8 and MWL-10 were not accessible due to windmill machinery. The Permittee also presents photographs that exhibit wells capped with windmill machinery; however, the photographs themselves do not appear to be sufficient to provide an explanation for the inaccessible nature of the wells. Provide additional information in the revised section as follows:

- a. Indicate the parts of the well cap and windmill machinery that prevent well MWL-8 from being accessed in the table discussion. Explain why the well cap cannot be removed from the casing and discuss potential measures to resolve the issue.



- b. Indicate the parts of the well cap and windmill machinery that prevent well MWL-10 from being accessed in the table discussion. Explain why the well cap cannot be removed from the casing and discuss potential measures to resolve the issue.

## 20. Section 2.2, Fall Sampling Event, Page 26

**NMED Comment:** The Permittee states that wells MWL-5, MWL-8, and MWL-10 were not accessible due to windmill machinery. The Permittee also presents photographs that exhibit wells capped with windmill machinery; however, the photographs themselves do not appear to be sufficient to provide an explanation for the lack of accessibility to the wells. Provide additional information in the revised section as follows:

- a. See comment 19a above
- b. See comment 19b above
- c. The table entry for well MWL-5 states, “[d]uring the spring sampling event Mr. Kottkamp and Mr. Clark moved the windmill machinery to allow access. Due to range conditions, this was not possible during the fall sampling event.” Explain the nature of “range conditions” that prevented well MWL-5 from being accessible during the fall groundwater monitoring event.

## 21. Section 3.1, Laboratories, Page 28

**Permittee Statement:** “The field team was unable to adjust the pH of the hexavalent chromium samples for some monitoring well samples to within the preservation range of the 14 day hold time; in these cases a 24 hour hold time was observed.”

**NMED Comment:** Section 4.2.1, SWMU-114, states that the groundwater sample for M114MW004 was analyzed three hours outside of the 24-hour hold time for hexavalent chromium during the spring sampling event. If the pH of the sample had been properly adjusted between 9.3 and 9.7, the hold time for the sample would have been 14 days rather than 24 hours. Discuss why the field team was not able to adjust the pH of the samples in all applicable sections of the revised Report. Ensure all samples are properly preserved for the longer hold time in the future.

## 22. Section 4.1, Groundwater Contours and Flow Direction, Page 31

**Permittee Statement:** “Depth to groundwater data is tabulated in Appendix B: Table 2a and Table 2b.”

**NMED Comment:** Appendix B, Table 2a, MAFR Summary Depth to Groundwater Data, presents depth to groundwater data, and Table 2b, MAFR Summary Groundwater Level Data 2003 to 2016, presents groundwater elevation data. Revise the statement for accuracy in the revised Report.

**23. Section 4.1.1, Chinle Formation, Page 31**

**Permittee Statement:** “MWQ-22 is screened in both the Chinle and Ogallala formations.”

**NMED Comment:** Provide additional information on why monitoring well MWQ-22 is screened in both the Chinle and Ogallala formations, and explain the purpose of screening the well across both formations. Screening a well across two aquifers may cross-contaminate the aquifers. Discuss the potential risk of cross-contamination in the revised Report. Propose to submit a work plan to abandon and replace well MWQ-22 in the revised Report, if appropriate.

**24. Section 4.1.1, Chinle Formation and Section 4.1.2, Ogallala Formation, Page 31**

**NMED Comment:** A discussion regarding the groundwater flow direction was included in the section; however, information on the calculated groundwater hydraulic gradient in each formation was not provided in the discussion. Provide groundwater hydraulic gradients for the Chinle and Ogallala formations in revised Sections 4.1.1 and 4.1.2 for each aquifer.

**25. Section 4.2, Analytical Data, Pages 31 through 33**

**Permittee Statement:** “Discussion regarding individual analytes is limited to concentrations exceeding applicable screening levels.”

**NMED Comment:** It is essential to fully evaluate and discuss all detected chemicals of concern (COCs) regardless of reported concentrations falling above or below applicable screening levels. Revise Section 4.2 to also include a more comprehensive discussion of all detected COCs at each SWMU and the respective screening level evaluation results.

**26. Section 5.0, Summary, Page 35**

**Permittee Statement:** “Groundwater samples collected from wells screened in the Ogallala formation contained analyte concentrations below applicable screening levels.”

**NMED Comment:** It is essential to fully evaluate and discuss all detected COCs even if the concentrations are below the applicable screening levels. Provide a more comprehensive discussion of all detected COCs and the screening evaluation results in the Section 5.0 discussion. Revise the Report accordingly.

**27. Appendix A, Figures, Figures 2-1, 2-2, 2-3, and 2-4, Groundwater Flow Maps**

**NMED Comment:** Include groundwater elevations for each monitoring well depicted on Figures 2-1, 2-2, 2-3, and 2-4. Additionally, signify interpreted groundwater flow directions with arrows on each figure. Revise the Report accordingly.

**28. Appendix A, Figures, Figure 2-3, Chinle Groundwater Flow Map October 2016**

**NMED Comment:** Monitoring well MWQ-14 is not depicted on Figure 2-3. All relevant monitoring wells must be included on the figure. In addition, a groundwater elevation is not provided for the contour line in the vicinity of wells MAO1MW001, MAO1MW002, MAO1MW003 and MAO1MW004. Provide a groundwater elevation for the contour line. Furthermore, the groundwater elevation for MAO2MW001D was 4,250.30 feet; however, the contour line that indicates the elevation for MAO2MW001D was 4,230 feet. The actual groundwater elevation is approximately 20 feet higher. Resolve these issues in the revised Report.

**29. Appendix A, Figures, Figure 2-5, Water Level Map April 2016, and Figure 2-6, Water Level Map October 2016**

**NMED Comment:** Well MWQ-1 is not depicted on Figure 2-5. Additionally, well MWQ-14 is not depicted on Figure 2-6. All relevant wells must be included on Figures 2-5 and 2-6. If necessary, provide a note explaining why a well was not gauged in the figures (e.g., dry, inaccessible). Revise Figures 2-5 and 2-6 accordingly.

**30. Appendix B, Tables and Charts, Table 2a, MAFR Summary Depth to Groundwater Data 2003 to 2016, and Table 2b, MAFR Summary Groundwater Level Data 2003 to 2016**

**NMED Comment:** The following issues were noted for Tables 2a and 2b and must be addressed as follows:

- a. Depth-to-groundwater measurement data was not collected for wells MWQ-3, 4, 5, 6, 7, 10, 11, 23, and MWL-1 and MWL-4 during the 2016 monitoring period. However, table notes were not provided for most wells where depth to groundwater measurement data was not collected. Include a note (e.g., inaccessible, abandoned, dry, no data, etc.) for each well listed on Tables 2a and 2b that explains why water level measurements were not collected from these wells during the monitoring period and for all other gauging events where groundwater measurements were not collected in the revised Report.
- b. A water level measurement for well MWL-10 was reportedly not collected because it was “silted up” in April 2016 and the previous seven gauging events. Water level

measurements for the same well were reportedly not collected because of an inaccessibility/safety hazard in October 2016. Explain the nature of safety hazard and clarify whether the issue of silt accumulation was resolved for well MWL-10 in the revised Report. Revise Table 2a and 2b accordingly.

- c. Table 2b shows the dates of water level measurement in days, months, and years; however, Table 2a shows the dates in months and years only. Revise Table 2a to include the day, month, and year the groundwater level data was collected for consistency with Table 2b in the revised Report.

**31. Appendix B, Tables and Charts, Table 5a, Summary of Analytical Results April 2016, and Table 5b, Summary of Analytical Results October 2016**

**NMED Comment:** Tables 5a and 5b contain multiple issues which must be addressed as follows:

- a. Table 5a lists the NMED tap water screening level for hexavalent chromium as 0.25 µg/L. Table 5b lists the screening level as 250 µg/L. Neither is correct. Resolve the discrepancy in the revised Report.
- b. Table 5a lists the EPA MCL for nitrate as 10,000 µg/L. Table 5b lists the screening level as 10 µg/L. Correct the error in the revised Report.
- c. Table 5a lists the EPA MCL for nitrite as 1,000 µg/L. Table 5b lists the screening level as 1 µg/L. Correct the error in the revised Report.
- d. The analysis method number for vinyl chloride has been listed as Method 6260 on Table 5a. Table 2b lists 8260B as the analysis method for volatile organic compounds. Correct the reference in the revised Report.
- e. Define the “NC” abbreviation in the Tables 5a and 5b qualifier notes.
- f. Five different screening criteria are listed on the tables. For clarity, highlight the screening level used for evaluation of site concentration data in Tables 5a and 5b in the revised Report.
- g. Define the “U” qualifier in the Tables 5a and 5b qualifier notes.

Colonel Hammons

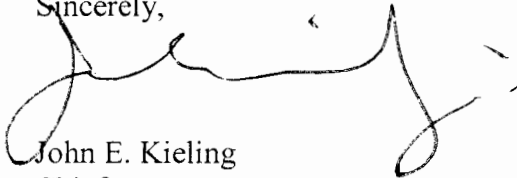
February 6, 2019

Page 13

The Permittee must submit a revised Report that addresses all comments contained in this Disapproval. In addition, the Permittee must include a response letter that cross-references where NMED's numbered comments were addressed. The Permittee must also submit an electronic redline-strikeout version of the revised Report showing all changes made to the Report. The revised Report must be submitted no later than **April 30, 2019**.

If you have any questions regarding this letter, please contact Gabriel Acevedo at (505) 476-6043.

Sincerely,



John E. Kieling

Chief

Hazardous Waste Bureau

cc: D. Cobrain, NMED  
B. Wear, NMED HWB  
G. Acevedo, NMED HWB  
M. Suzuki, NMED HWB  
L. King, EPA Region 6 (6MM-RC)  
R. Lancaster, CAFB  
S. Kottkamp, CAFB  
M. Fuchs, CAFB  
D. Canales, CAFB

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