



**Michelle Lujan Grisham**  
Governor

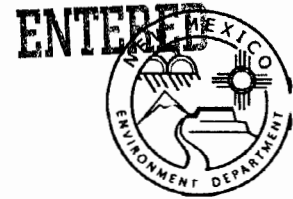
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**NEW MEXICO  
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**Hazardous Waste Bureau**

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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**



**James C. Kenney**  
Cabinet Secretary

**Jennifer J. Pruett**  
Deputy Secretary

July 2, 2020

Colonel Robert A. Masaitis  
Commander, 27th Special Operations Wing  
100 Air Commando Way, Suite 100  
Cannon Air Force Base  
New Mexico 88103-5214

**RE: THIRD DISAPPROVAL  
ANNUAL GROUNDWATER MONITORING REPORT 2016 -REVISION 2  
MELROSE AIR FORCE RANGE  
EPA ID# NM5572124456  
HWB-MELR-17-001**

Dear Colonel Masaitis:

The New Mexico Environment Department (NMED) has received the United States Air Force (Permittee) *Annual Groundwater Monitoring Report 2016- Revision 2*, (Report), submitted on behalf of Melrose Air Force Range and dated June 3, 2019. NMED hereby issues this Disapproval. NMED's comments are provided in the attachment to this letter. The Permittee must address all comments in the attachment.

NMED's review of the second revision of the Report has identified over one hundred errors, discrepancies, inaccuracies, typos, or inconsistencies in information and data presented in the Report. In many cases, NMED has previously provided either general or specific directives in comments to address these issues during review of the prior two versions of the Report. The Permittee has consistently failed to ensure that the Report and supporting information is an accurate and reliable source of information documenting required periodic groundwater monitoring at Melrose Air Force Range. It is the responsibility of the Permittee to ensure that accurate and complete information is presented in all documents submitted to NMED for review as required by the Melrose Air Force Range Hazardous Waste Permit (Permit). Failure

by the Permittee to thoroughly review the Report, and ensure its accuracy, and address all NMED comments constitutes noncompliance with the corrective action requirements of the Permit and may result in an enforcement action.

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 **October 30, 2020**.

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

Sincerely,

**Kevin  
Pierard**

Digitally signed by  
Kevin Pierard  
Date: 2020.07.02  
08:56:31 -06'00'

Kevin M. Pierard, Chief  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
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R. Lancaster, CAFB  
J. Pignataro, CAFB  
C. Gierke, CAFB  
M. Fuchs, CAFB  
C. Chavez, CAFB

File: CAFB 2020 and Reading

Attachment

## **GENERAL COMMENTS**

### **1. Report Accuracy**

**NMED Comment:** Over one-hundred errors, inconsistencies, typos, discrepancies, or inaccuracies were noted during review of the Report. The Permittee must thoroughly review the Report and ensure that NMED's comments provided in this attachment are addressed. The Permittee has consistently failed to ensure that the Report and supporting information is coherently presented and accurate and that the Report is a reliable source of information documenting the required periodic groundwater monitoring at Melrose Air Force Range.

As clarification, it is the responsibility of the Permittee to ensure accurate and complete data and information is presented in all documents submitted to NMED for review as required by the Melrose Air Force Range (MAFR) Hazardous Waste Permit (Permit). NMED has provided considerable direction to the Permittee in response to the Report and adequate time to address the identified issues. Therefore, failure by the Permittee to thoroughly review the Report, and ensure its accuracy, and address all NMED comments constitutes noncompliance with the corrective action requirements of the Permit and may result in an enforcement action.

### **2. Required Permittee Report Cover Letter Certification Statement**

**NMED Comment:** The Permittee's revised Report, as well as all documents submitted to NMED, must include the following 40 Code of Federal Regulation (CFR) Section 270.11(d)(1) statement for signatories to reports:

*"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."*

Failure to include the signed statement in the revised Report, or any other submittal to NMED, will result in rejection of the document and the re-assessment of document review fees.

### **3. Concentration Units for Table 6a through 6aa and Data Charts**

**NMED Comment:** NMED's February 6, 2019 *Second Disapproval 2016 Annual Groundwater Monitoring Report Revision 1* (Second Disapproval) Comment 11 required the Permittee to ensure all concentration units noted in the hard copy and electronic PDF version of the Report for Tables 6a through 6aa were accurate. The Permittee noted in the response to

NMED comment that the Report had been amended accordingly. NMED's review of the current Report (Revision 2) indicates NMED's comment was not addressed in the revised hard copy Report as required.

Notes for Tables 6a through 6aa in the hard copy version of the current Report continue to note that chemical of concern (COC) concentrations are reported in grams per liter (g/L). Respective table data chart units were also noted as grams per liter in the hard copy version of the Report. The discrepancy does not appear to have affected the actual numerical data presented in the tables and was not noted for table and chart units presented in the electronic PDF version of Report, which are noted as micrograms per liter. The Permittee must thoroughly review and ensure Tables 6a through 6aa and respective data charts in the hard copy version and electronic PDF version of the revised Report are accurate and consistently noted in the tables and respective data charts for both hard copy and electronic versions of the revised Report. Review and revise the Report accordingly.

#### 4. Reporting of Volatile Organic Compound (VOC) Concentration Data

**NMED Comment:** The Permittee's response to NMED Comment 12 of the Second Disapproval stated "[w]e were unable to attain the missing laboratory results for VOCs at this time. The limited suite of VOCs chosen for analysis was due to miscommunication between CAFB and Bear Engineering that was not revealed until the 2018 sampling event. The previous years reports included notes that VOCs analysis was performed for a target compound list." The sample analysis data reports provided with the prior 2015 MAFR annual groundwater monitoring report appear to indicate groundwater samples were analyzed for the full suite of United States Environmental Protection Agency (EPA) Method 8260 VOCs. Groundwater samples collected at MAFR during periodic monitoring must always be analyzed for the full suite of analytes included for Method 8260 VOCs and the results reported in the respective report. Provide sample analysis reports for the full suite of VOCs in the revised Report and include the additional sample analysis data accordingly.

#### 5. Page Numbers for Report Figures, Tables, and Charts

**NMED Comment:** Appendix A and B contain multiple pages with no page numbers. Every page of every submittal whether text, table or chart, must include a page number. This applies to all sections of the Report including appendices. Revise the Report accordingly.

### SPECIFIC COMMENTS

#### 6. Section 1.2, Site Description and History, Page 4

**Permittee Statement:** "Monitoring well MAO2MW001D (SWMU [Solid Waste Management Unit]-131) is located approximately 1,500 feet to the northeast of ST [Storage Tank]-506."

**NMED Comment:** The reported 1,500-foot distance between monitoring well MAO2MW001D and ST-506 does not appear to be accurate. Information provided in the Permittee's May 13, 2014 notification identifying ST-506 and associated contamination indicates that the storage tank site is located at or near MAFR Building 3121. Based on readily available aerial photography and prior report information, monitoring well MAO2MW001D appears to be located approximately 300 feet northeast of Building 3121. Review the information provided in the statement and ensure that the distance reported between monitoring well MAO2MW001D and ST-506 is accurate in the Revised Report. Additionally, cite and appropriately reference any correspondence or other information which includes location information for ST-506 in the revised Report.

**7. Section 1.3.1, Inactive Wells, Page 8**

**Permittee Statement:** "There are several wells located on MAFR that are 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 in Appendix A. Details of these wells are listed in Table 2a in Appendix B."

**NMED Comment:** Well status details are also provided on Table 2b, MAFR Summary of Groundwater Elevation Data 2003 to 2016. Revise the statement to reflect this. Ensure that the information provided on each table is accurate and complete. Revise the Report accordingly.

**8. Section 2.1, Spring Sampling Event, Pages 11 through 12**

**NMED Comment:** The provided discussion of the well conditions and obstructions encountered during attempted water level gauging at wells MWL-5, MWL-8, and MWL-10 is sufficient information and rationale for not collecting water level measurements at each well. Remove the photographs from the section discussion in the revised Report. The photographs may be included in the revised Report in an additional appendix with appropriate reference to respective photos for each well in the section discussion. Review all section information provided, ensure its accuracy, and revise the Report as necessary.

**9. Section 2.3, Investigation Derived Waste, Pages 15**

**Permittee Statement:** "Approximately 10 gallons of well purge water and water used to decontaminate equipment was in the 55-gallon drum at the end of the 2016 fall sampling event. Once the 55-gallon drum is full, the contents will be sampled for characterization and disposed of based on the analytical results of the waste characterization."

**NMED Comment:** Upon disposal of purge and decontamination water from groundwater monitoring events, the Permittee must provide waste characterization and waste disposal manifest documentation with the contemporaneous groundwater monitoring report. No revision is required.

**10. Section 3.3, Field Parameters and Equipment, Page 17**

**Permittee Statement:** “Well construction details and pump placement are presented in Table 1 in Appendix B.”

**NMED Comment:** The Report does not contain a Table 1. Well construction detail information is provided in Table 1a, Well Properties. Revise the statement to correct the table reference and ensure all tables are accurately and appropriately numbered and referenced in the revised Report.

**11. Section 3.4, Semiannual Groundwater Quality Well Network, Page 18**

**NMED Comment:** The end of Section 3.0, Sampling and Analysis Plan, was indicated on Report Page 17 by what appeared to be the end of the section text followed by the remaining three-quarters of the page being left blank. However, Section 3.4 was noted to be on the following page (Page 18) with Section 4.0, Results, information and was followed by Section 3.5, Annual Groundwater Quality Well Network. For consistency with the Report format, ensure that Section 3.4 and 3.5 are provided consecutively after Section 3.3 within Section 3.0 information on the appropriate page of the revised Report.

**12. Section 4.1., Groundwater Contours and Flow Direction, Page 18**

**NMED Comment:** Identified section issues must be addressed as follows:

- a. The Permittee states that “[g]roundwater flow direction is represented in Appendix A.” Revise the statement to state the actual Appendix A figures that include groundwater elevations, contours, and inferred groundwater flow direction information for the site in the revised Report.
- b. The Permittee states that “Figure 4-5 and Figure 4-6 depict the groundwater elevations for the May and October sampling events.” However, additional section information indicates that spring groundwater gauging data was collected on April 4 and 5, 2016. Revise the statement to correct the month for the spring groundwater level gauging event in the revised Report.

**13. Section 4.1.1, Chinle Formation and Section 4.1.2, Ogallala Formation, Page 18**

**NMED Comment:** As required by Second Disapproval Comment 24, calculate groundwater gradients based on groundwater elevation data collected from monitoring wells completed in the Chinle and Ogallala Formations. Discuss the calculated groundwater gradients for each formation in the revised Report.

**14. Section 4.1.2, Ogallala Formation, Page 18**

**Permittee Statement:** “Groundwater elevation data can be found on Tables 2a and 2b. Groundwater elevation data can be found on Tables 2a and 2b.”

**NMED Comment:** Remove the typographical error from the revised Report.

**15. Section 4.2, Analytical Data, Page 19**

**NMED Comment:** The Permittee did not adequately address Comment 25 of NMED’s Second Disapproval requiring discussion of groundwater sample analytical results in the section discussion. In response to NMED’s comment, the Permittee has simply listed various COCs detected at MAFR monitoring wells in a section bullet. Information on the location of detections and any significant data trends were not provided with the list of COCs. As previously required, discuss any significant observed COC concentration data trends and screening level exceedances. Include location information (SWMU and monitoring well) for observed data trends and all cleanup level exceedances for the COCs cyanide, explosives, hexavalent chromium, metals, nitrate and nitrite, perchlorate, VOCs, and the water quality parameters alkalinity, total dissolved solids, chloride, and sulfate in Sections 4.2.1 through 4.2.5 in the revised Report. Revise the Report accordingly.

**16. Section 4.2.1, SWMU 114, Pages 19 through 20**

**Permittee Statement:** “Analytes exceeding applicable screening levels at this SWMU are TDS [total dissolved solids], sulfates, and chloride. These analyte concentrations have traditionally been above 20.6.2.3103 NMAC [New Mexico Administrative Code] screening levels and are within historical ranges for these wells with the exception of those analytes highlighted in gray in Table 5c in Appendix B.”

**NMED Comment:** New contaminant concentrations exceeding applicable screening levels are not highlighted in gray on Table 5c. Revise Table 5c to reflect the newly identified exceedances. The table highlighting reference discrepancy was also noted in Section 4.2.4 and must also be corrected. Revised the Report accordingly.

**17. Section 5.0, Summary, Page 22**



**NMED Comment:** Comment 15 requires further discussion of analytical results in the text. The Permittee must also expand the summary to include a discussion of observed COC concentration data trends and cleanup level exceedances of significance for the SWMU monitoring well networks and the semiannual and annual monitoring well networks in the revised Report.

#### 18. Figure 1-2, Monitoring Well Network

**NMED Comment:** Water-level only well MWL-4 is noted as an active well on the figure; however, the well was identified as removed from the well network on Table 2a, MAFR Summary Depth to Groundwater Data 2003 to 2016. Revise the figure to indicate that MWL-4 is an inactive well. Additionally, clarify the rationale for removing the well from the groundwater level gauging schedule in revised Report Sections 2.1 and 2.2.

#### 19. Figure 1-3, Solid Waste Management Units and Monitoring Wells

**NMED Comment:** Identified issues with the figure must be addressed as follows:

- a. SWMU 130 monitoring wells MAO1MW003 and MAO1MW004 locations are transposed on the figure. Based on well location information previously provided in the MAFR Annual Groundwater Monitoring Reports for 2013, 2014, and 2015, MAO1MW004 is the northern monitoring well and MAO1MW003 is the eastern monitoring well. The well location error was also identified on Figures 4-7 and 4-9. Revise the figures to correct the error and ensure all site monitoring wells are accurately depicted on all revised Report figures. Ensure that all respective data for each monitoring well is accurately reported in the revised Report. Revise the Report accordingly.
- b. SWMU 114 monitoring wells M114MW001 and M114MW004 locations are transposed on the figure. Based on well location information previously provided in prior MAFR annual groundwater monitoring reports, M114W001 is the central well and M114MW004 is the northeastern monitoring well. The discrepancy was also noted on Figures 4-7 and 4-9. Revise the figures to correct the error and ensure all site wells are accurately depicted on revised Report figures. Ensure that all respective data for each monitoring well is accurately reported in the revised Report. Revise the Report accordingly.
- c. SWMU 131 monitoring well MAO2MW001S is depicted in the wrong location on the figure. Based on well location information previously provided in prior MAFR annual groundwater monitoring reports, MAO2MW001S was one of two nested wells located at SWMU-131. MAO2MW001S must be accurately depicted at the correct location on the figure in the revised Report.

- d. The figure scale does not appear to be accurate. Review the figure and ensure the scale is accurate in the revised Report.

#### **20. Figure 4-1, Chinle Groundwater Flow Map**

**NMED Comment:** Identified issues with the figure must be addressed as follows:

- a. The title for Figure 4-1 indicates spring groundwater gauging data was collected in May 2016; however, Report information indicates spring groundwater level gauging data was collected in April 2016. Revise the figure to cite the correct month for data collection in the revised Report.
- b. Well MW114MW003 and its respective groundwater elevation was not depicted on the figure. Revise the figure to depict the well and respective groundwater elevation in the revised Report.
- c. Well MAO1MW004 and its respective groundwater elevation was not depicted on the figure. Revise the figure to depict the well and respective groundwater elevation in the revised Report.

#### **21. Figure 4-3, Chinle Groundwater Flow Map October 2016**

**NMED Comment:** The groundwater elevation for MW114MW004 for May 2016 was depicted on the figure for the October 2016 event. Revise the figure to only include the groundwater elevation for the October 2016 event and remove the redundant well location reference label in the revised Report.

#### **22. Figure 4-5, Groundwater Elevation Map April 2016**

**NMED Comment:** Identified issues with the figure must be addressed as follows:

- a. Based on groundwater monitoring well location information provided on Figure 1-2 and prior groundwater monitoring report information, monitoring well MWL-8 is located incorrectly on Figure 4-5. The discrepancy was also noted on Figure 4-6, Groundwater Elevation Map October 2016. Revise Figure 4-5 and 4-6 to depict

MWL-8 at the correct location in the revised Report.

- b. Figure 4-5 groundwater elevations are from all active monitoring and water level measurement wells completed in either the Chinle and Ogallala formation and cannot be collectively used to accurately determine groundwater flow direction at MAFR. Remove the groundwater direction arrow from Figures 4-5 and 4-6 of the revised Report.

### **23. Figure 4-7, Analytical Parameters Exceeding Screening Levels April Semiannual Well Network 2016**

**NMED Comment:** Identified issues with the figure must be addressed as follows:

- a. COCs in exceedance of respective screening levels are highlighted in red. For clarity, revise the figure legend to signify that COC concentrations highlighted in red have exceeded their respective screening levels.
- b. Firebreaks and roads are redundantly defined in the figure legend and on the actual figure. Remove the redundancy in the revised Report.
- c. The concentration data for monitoring well MW114MW002 is depicted as the concentration data for monitoring well MAO1MW002. Revise the figure to include the correct concentration data for each monitoring well depicted in the revised Report.
- d. Vinyl chloride has exceeded the NMED tap water screening level at MAO2MW001D based on Table 5a, Summary of Analytical Results data. Clarify why the exceedance was not depicted on Figure 4-7 or revise the figure to include the reported exceedance and discuss the exceedance in the appropriate sections of the revised Report.
- e. The monitoring well location and concentration data for MA01MW003 and MA01MW004 are transposed on the figure. Revise the figure to depict the monitoring wells and concentration data for respective wells at the correct locations in the revised Report.
- f. The monitoring well location and concentration data for M114MW001, M114MW003, and M114MW004 are transposed on the figure. Revise the figure to depict the monitoring wells and concentration data for respective wells at the correct locations in the revised Report.

### **24. Figure 4-8, Analytical Parameters Exceeding Screening Levels April Annual Well Network**

**2016**

**NMED Comment:** Identified issues with the figure must be addressed as follows:

- a. For clarity, revise the figure legend to signify that COC concentrations highlighted in red have exceeded their respective screening levels in the revised Report.
- b. Firebreaks and roads are redundantly defined in the figure legend and on the actual figure. Remove the redundancy in the revised Report.
- c. The concentration for dissolved iron does not exceed the cleanup level. Revise the figure to depict the reported concentration as not exceeding the screening level (i.e., remove the red highlight).
- d. Concentration data is presented on Figure 4-8 for MWQ-24, a semiannual network monitoring well. Remove the redundant concentration information from the figure in the revised Report.

**25. Figure 4-9, Analytical Parameters Exceeding Screening Levels October Semiannual Well Network 2016**

**NMED Comment:** Identified issues with the figure must be addressed as follows:

- a. For clarity, revise the figure legend to signify that COC concentrations highlighted in red have exceeded the screening levels.
- b. Clearly label roads and firebreaks on the figure and remove respective symbols and definitions from the figure legend in the revised Report.
- c. The total selenium concentration for monitoring well MAO2MW001D (59.0000 micrograms per liter ( $\mu\text{g/L}$ )) must be reported to nearest tenths place in the same manner as the dissolved selenium concentration (e.g., 54.8  $\mu\text{g/L}$ ). Revise the Report accordingly.

**26. Table 1a, Well Properties**

**NMED Comment:** As clarification, the table provides well construction detail information for all groundwater monitoring and water level only wells at MAFR and was previously titled as such in prior reports. Revise the table title to include the table number (i.e., Table 1a) an accurate table content description (e.g., Summary of Well Construction Details). The table number and title must be provided at the top of the table in the revised Report.

## 27. Tables 1b and 1c, Semiannual Sample Methods and Annual Sample Methods

**NMED Comment:** Identified Tables 1b and 1c issues must be addressed as follows:

- a. Revise the table titles to include the actual information provided in the tables (e.g., semiannual or annual monitoring well network, and analytical methods used).
- b. Ensure that the tables are appropriately sized for the pages they are presented on and ensure that the table numbers and titles are provided at the top of each table in the revised Report.
- c. Table note five for perchlorate is not defined in the table notes information. Define the table note provided for perchlorate in the revised table information. As provided in prior reports, ensure that all table note references are superscripted where noted for table data. Revise the Report accordingly.

## 28. Table 2a and 2b, MAFR Summary Depth to Groundwater Data 2003 to 2016 and MAFR Summary Groundwater Elevation Data 2003 to 2016

**NMED Comment:** Identified issues with Tables 2a and 2b must be addressed as follows:

- a. As provided in prior reports, all blank data cells on Tables 2a and 2b must include an actual data entry specifying that no data was collected and must be defined in the notes for each table.
- b. Table note two does not appear to be used anywhere on Tables 2a and 2b. Include the table note where applicable on the tables or remove the note if not applicable in the revised Report.
- c. Field notes provided with the Report indicate that the depth to groundwater was recorded as 13.15 feet below ground surface for water level-only monitoring well MWL-5 during the April 2016 gauging event. However, Tables 2a and 2b indicate that the well was inaccessible during the April 2016 gauging event. Revise Tables 2a and 2b to reflect the data collected at the well during the spring groundwater monitoring event in the revised Report.
- d. The groundwater level entries for MWL-2, MWL-3, and MWQ-19 for September 26, 2011 were provided as "N" on Table 2a and also for MWQ-19 on Table 2b; remove the entry from the tables or define it in the table notes for each table in the revised Report.
- e. Discrepancies were noted for groundwater elevation data reported on Table 2b for

monitoring wells MA01MW004 for April 2016, MWQ-12 for April and October 2016, MWQ-13 for April 2016, MWQ-22 for April and October 2016, and MWL-12 for April and October 2016. Review the groundwater elevation data and ensure all data included on the table is accurate and complete.

- f. For consistency, revise Table 2b to indicate that well MWL-1 was removed from the groundwater level-only network as indicated on Table 2a. Clarify, why the well was removed from the network in the appropriate section(s) of the revised Report.

### 29. Table 3a, Summary April 2016 Annual and Semiannual Field Water Quality Data

**NMED Comment:** All reported field parameter data for the annual monitoring network wells for April 2016 appear to be transposed on the table. For example, the field parameter readings reported for monitoring well MWQ-22 on the table are the measurements recorded in field notes for MWQ-14. Review all data provided on the table and ensure that the correct field parameter data for each respective well are included in the revised Report. Additionally, ensure that Tables 4a through 4e data and respective data charts reflect accurate field parameter readings for all wells. Revise the Report accordingly.

### 30. Table 5a and 5b, Summary of Analytical Results April and October 2016

**NMED Comment:** Identified issues with the table must be addressed as follows:

- a. As previously directed in NMED's October 16, 2015 *Approval with Modification Annual Groundwater Monitoring Report Revision 1 Melrose Air Force Range, July 2015* response letter, and reclarified in NMED's October 20, 2017 *Disapproval 2016 Annual Groundwater Monitoring Report* response letter, the applicable cleanup levels for evaluation of all COCs in groundwater shall be the New Mexico Water Quality Control Commission (WQCC) groundwater quality standards, 20.6.2.3103 NMAC, the cleanup levels calculated for toxic pollutants listed in 20.6.2.7.T(2) NMAC, and the drinking water maximum contaminant levels (MCLs) adopted by EPA under the federal Safe Drinking Water Act (42 U.S.C. 300f to 300j-26). If both a WQCC groundwater quality standard and an MCL have been established for an individual COC, then the lower of the levels shall be the cleanup level for that substance. The most recent version of the NMED's Tap Water Screening Levels listed in Table A-1 of the 2019 NMED Risk Assessment Guidance for Site Investigation and Remediation (as updated) shall be used to establish the cleanup level if neither a WQCC standard or an MCL has been established for a specific COC. In the absence of an NMED tap water screening level then the EPA Regional Screening Levels for Chemical Contaminants at Superfund Sites (RSLs, as updated) for tap water shall be used as the cleanup level. As an exception, hexavalent chromium concentrations

must be evaluated with the WQCC groundwater quality standard for dissolved chromium. Review all screening levels used for evaluation of COCs on Tables 5a and 5b, ensure they are correct and that the appropriate screening level is applied as the cleanup level for each COC, and ensure that the cleanup level used is appropriately highlighted on the table. Revise any affected Report sections and other tables accordingly.

- b. The reported manganese total and dissolved concentrations for MWQ-19 and MWQ-20 exceeded the applicable cleanup level for the April 2016 sampling event; however, the concentrations have not been highlighted as exceedances. Revise the table to indicate that the concentrations exceeded the cleanup level.

### 31. Table 5c, Summary of Analytical Applicable Screening Levels in 2016

**NMED Comment:** Identified issues with the table must be addressed as follows:

- a. The reported concentration for MWQ-22 for total dissolved solids (1,930,000 µg/L) exceeded the respective screening level; however, the concentration has not been highlighted as such. Revise the table to highlight the exceedance in the revised Report.
- b. Provide clarification for why vinyl chloride was not listed as a cleanup level exceedance on the table or revise the table to reflect the exceedance and discuss it in appropriate sections of the revised Report (e.g., Sections 4.0 and 5.0).

### 32. Tables 6a through 6ah, Historical COC Concentrations and Data Charts

**NMED Comment:** The following issues must be addressed for Tables 6a through 6ah in the revised Report as follows:

- a. COC cleanup levels and/or regulatory cleanup level source information noted on various historical COC concentration tables do not correspond to the cleanup levels highlighted as the cleanup level and/or regulatory cleanup level source noted on Tables 5a and 5b. This issue was identified on Tables 6a, 6b, 6c, 6e, 6i, 6k, and 6ad. Review all COC cleanup levels noted on the tables and revise the notes for each table to accurately cite the groundwater cleanup level and regulatory source in the revised Report.
- b. At least twenty-four discrepancies between historic COC concentration data reported on the tables for the April and October 2016 sampling events and data reported on Tables 5a and 5b were noted during review of the Report. The discrepancies were noted on Tables 6a, 6c, 6d, 6i, 6j, 6k, 6l, 6q, 6r, 6s, 6x, 6z, and

- 6ac. Review all table and chart data and ensure all data reported in the revised Report is accurate and complete. Revise the Report accordingly.
- c. Ensure that all Table 6k concentrations for the April and October 2016 sampling events for copper are noted in black font on the table where the concentrations are reported above the method detection limit and ensure that the data is reflected in the respective data charts for the table. Revise the table data accordingly.
  - d. Table 6o data indicates that the cleanup level for manganese was exceeded for total and dissolved manganese at monitoring well MWQ-2 for April 2016. Ensure the concentrations are highlighted to indicate that the concentrations exceeded the cleanup level in the revised Report.
  - e. Various Table 6t minimum, maximum, and average concentration data for listed monitoring wells are reported as zero where no detections have been reported for all sampling events at a monitoring well. For consistency with other table data in the Report, where applicable, ensure "non-detect" data is reported as less than the detection limit (i.e. < the numeric detection limit value.) in the revised Report.
  - f. Eight Table 6ab data charts and seven Table 6ad data charts do not reflect the respective historical data for each respective table. All identified charts for the wells report a concentration of zero for all sampling events. Review and revise the Table 6ab and 6ad data charts and ensure they reflect the historical data in the revised Report.
  - g. A Table 6ab minimum chloride concentration was not included in the data column for MWQ-24. Include a minimum chloride concentration for MWQ-24 in the revised Report.

### 33. Table 6ai, Historical VOCs Concentrations

**NMED Comment:** Historical methylene chloride concentrations (0.5 µg/L) for the January 2010 sampling event were omitted from the table for monitoring wells MAO1MW003 and MAO2MW001D. Ensure the concentrations are included in the revised Report.

### 34. Table 7b, Fall Split Sample Comparison

**NMED Comment:** The VOC analytical method is listed as EPA Method 6260 on the table. Samples collected for VOCs analysis were analyzed by EPA Method 8260. Revise the table to cite the correct analysis method in the revised Report.