

WSMR 07



**DEPARTMENT OF THE ARMY  
U.S. ARMY GARRISON WHITE SANDS  
100 Headquarters Avenue  
WHITE SANDS MISSILE RANGE, NEW MEXICO 88002-5000**

January 4, 2007

REPLY TO  
ATTENTION OF



Office of the Garrison Commander

Mr. James Bearzi  
New Mexico Environment Department  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303

**Subject: LC -38 Diesel Spill Site (SWMU 198; CC Site CCWS-09) and Response to October 2006 NMED Comments on the February 2002 LC-38 SWMU Assessment Report**

Dear Mr. Bearzi:

The additional information and clarification requested in your October 13, 2006 letter subject *Response to the SWMR Assessment Report for the LC-38 Diesel Spill on White Sands Missile Range* are provided in the attached response table (1 print copy). The response table will also be provided to you via email.

Regarding Comment 2 presented in your October letter, the resampling of monitoring well MW-002 for Volatile Organic Compounds as well as Resource Response and Recovery Act Metals will occur this year pending funding. This project will receive the highest priority and will be accomplished upon receipt of proper approvals.

The following certification is provided as required by our permit and according to NMAC 20.4.1.900, incorporating 40 CFR 270.11:

*"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."*

Copies furnished, with enclosure (1 copy each), to Ms. Cheryl Frischkorn, NMED-HWB; Mr. Chuck Hendrickson, Region VI EPA; Ms. Yvonne Tyler, Army Installation Management Command; and, without enclosure, to Mr. John Kieling, NMED-HWB; and White Sands Technical Services, LLC.

Should you have any questions regarding this matter, please contact Mr. Jose Gallegos of our Environmental Compliance office at (505) 678-1007.

Sincerely,

A handwritten signature in black ink that reads "Thomas A. Ladd". The signature is written in a cursive style with a large initial 'T' and 'L'.

Thomas A. Ladd  
Director, Public Works

Enclosure

**Response to NMED letter of 13 October 2006 -  
 RESPONSE TO THE SWMU ASSESSMENT REPORT FOR THE LC-38 DIESEL SPILL ON WHITE SANDS MISSILE RANGE  
 WHITE SANDS MISSILE RANGE, EPA 1D NO. NM2750211235 WSMR-06-008 & WSMR-06-004**

Comment Number	NMED Comments	WSMR Response	Discussion
<p><b>NMED introductory statement:</b> The New Mexico Environment Department (NMED) has reviewed the Department of Army's (the Permittee) <i>Final SWMU Assessment Report for the LC-38 Diesel Spill</i>, dated September 2004 and <i>Work Plan for the RCRA Facility Investigation at the Launch Complex 38 Site on White Sands Missile Range (WSMR)</i>, dated February 2002.</p> <p>Based on its review of these documents, NMED has determined that this site is not yet eligible for a Corrective Action Complete determination. The Permittee must address the following comments within 90 days of receipt of this letter. The Permittee must include a response letter that details where revisions have been made.</p>			
1	<p>Dibromochloromethane was detected in monitoring well MW-002 and, as stated by the Permittee, a New Mexico Water Quality Control Commission (WQCC) standard has not been established for this constituent. The Permittee must apply the Region 6 Human Health Medium Specific New Mexico Soil Screening Levels 2006 (tap water screening levels (Table A-1, June 2006)) for this constituent, and any other constituents which do not have an established standard.</p>	<p>Bromodichloromethane was also detected in MW002. This compound also does not have a standard established under NMAC 20.6.2.3103. In the absence of specific standards, WSMR used the EPA Drinking Water Standard of 80 µg/L <b>total</b> trihalomethanes, which is an order of magnitude above the observed concentrations. We continue to assert that this is a completely proper comparison.</p>	<p>Comparing the concentration of the two detected trihalomethanes with the referenced tap water screening levels, we find:          CHClBr<sub>2</sub> = 1.57 µg/L vs. 1.32 µg/L          CHBrCl<sub>2</sub> = 1.16 µg/L vs. 1.78 µg/L          Therefore, CHClBr<sub>2</sub> does exceed the referenced screening level by 20%. [A:] these numbers are very close to the reporting limit of 1 µg/L] Given that the groundwater at the site has total dissolved solids concentrations of 5,000 to 9,000 mg/L, WSMR believes the exceedance is irrelevant.</p> <p>The resampling to be conducted as discussed under Comment 2 will allow WSMR to re-evaluate these levels and supply additional information for NMED consideration.</p>
2	<p>Cadmium was detected in monitoring well MW-002. The Permittee has stated that "since these analytes were only detected in MW-002, it is reasonable to assume they are associated with the potable water used during development of the well." The Permittee must resample monitoring well MW-002 for all VOCs, as well as Resource Response and Recovery Act (RCRA) metals. The results of this sampling must be included in the response.</p>	<p>The resampling effort will be conducted as rapidly as practicable.</p>	<p>Monitor Well MW002 will be sampled, in duplicate, for total RCRA metals and VOCs (SW846 6010A, 7470A, and 8260A), utilizing low-flow sampling techniques.</p>

**Response to NMED letter of 13 October 2006 -  
 RESPONSE TO THE SWMU ASSESSMENT REPORT FOR THE LC-38 DIESEL SPILL ON WHITE SANDS MISSILE RANGE  
 WHITE SANDS MISSILE RANGE, EPA 1D NO. NM2750211235 WSMR-06-008 & WSMR-06-004**

<b>Comment Number</b>	<b>NMED Comments</b>	<b>WSMR Response</b>	<b>Discussion</b>
3	The Permittee proposes a 10-year annual monitoring plan at the site. NMED agrees that annual ground water monitoring should occur; however, it is a premature to limit monitoring to a 10 year period. Therefore, annual groundwater monitoring must continue until NMED determines otherwise.	WSMR will consult with NMED prior to discontinuing the monitoring program.	It has been WSMR's intention to continue sampling for the specified period, then consider the results before deciding, with NMED, on a further course of action.