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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 19, 2012

Thomas A. Ladd, Director
Environment and Safety Directorate
U.S. Army White Sands Missile Range
White Sands Missile Range, New Mexico 88002-5000

**RE: APPROVAL WITH MODIFICATIONS
RCRA FACILITY INVESTIGATION WORK PLAN
SWMUs 86 AND 87, MAIN POST SANITARY LANDFILL (WSMR-81)
AND CONSTRUCTION LANDFILL (WSMR-82)
WHITE SANDS MISSILE RANGE, NEW MEXICO
EPA ID # NM2750211235
HWB-WSMR-11-011**

Dear Mr. Ladd:

The New Mexico Environment Department (NMED) has completed its review of the U.S. Army White Sands Missile Range (Permittee) *RCRA Facility Investigation Work Plan, SWMUs 86 and 87, Main Post Sanitary Landfill (WSMR-81) and Construction Landfill (WSMR-82)* (Work Plan) dated April 2012. NMED has reviewed the Work Plan and hereby issues this approval with the following modifications.

Comment 1

NMED's Comment 4 from the November 4, 2011 Notice of Disapproval (NOD) letter required the Permittee to correct the NMAC citation. However, the citation is still incorrect. The Permittee has incorrectly replaced the number one (1) of 20.9.2.7.L(1)(c) NMAC with the Roman numeral one "I" (20.9.2.7.L(I)(c) NMAC). In future submittals, ensure all citations are correct.

Comment 2

NMED's Comments 11 and 15 from the November 4, 2011 NOD letter required the Permittee to analyze samples for the full suite of volatile organic compounds (VOCs). The Permittee's response to Comment 15 is that the recent data showed no consistent hits of VOCs and will not be included in the sample plan. However, data results from 2011 and 2012 in Appendix C for groundwater monitoring wells MPL-01, MPL-02, MPL-03, and MPL-04 reported that 1,2-dichloroethane were greater than the EPA drinking water standard (5 µg/L). Therefore, the Permittee must test the samples for the full analytical suite of VOCs and also collect a duplicate sample at MPL-03. If the required analyses are not conducted, NMED will not be able to defend a corrective action complete determination for this site.

Comment 3

NMED's Comment 13 from the November 4, 2011 NOD letter required the Permittee to provide groundwater monitoring data from 15 monitoring wells (MPL-01 through MPL-07, MPL-13, MPL-14, MPL-19 through MPL-22, T-29, and T-34) to determine if additional monitoring wells are needed to monitor the Main Post Landfill. NMED has reviewed the data from Appendix C and determined that the Permittee must collect groundwater samples from wells MPL-01 through MPL-04, MPL-06, MPL-19, and MPL-20. In addition, all groundwater samples must be analyzed for a full suite of VOCs, nitrates/nitrites, target analyte list (TAL) metals, cyanide, alkalinity, sulfate, and field water quality parameters (*see* Comment 2). NMED will review the data and determine whether continued monitoring of the additional wells is necessary after receipt of the results from the first two monitoring events.

Comment 4

NMED's Comment 23 of the November 4, 2011 NOD required the Permittee to remove Appendices A and D from the Work Plan. The Permittee did not remove them from the revised Work Plan. The Permittee is reminded that NMED does not review or approve Site-Specific Quality Assurance Project Plans (QAPP), Quality Control Plans, and Project Forms. Approval of this Work Plan does not constitute approval of the QAPP, Quality Control Plan, or the project forms. In future submittals, all directly related information contained in the QAPP must be included in the body of submitted work plans and reports as specified in Appendix 7 of the Permit.

Comment 5

Figure 1-4 (Potentiometric Surface Map) depicts the current groundwater elevation data from the January 2012 groundwater monitoring event. There appears to be an error with the presentation of the groundwater elevation contours on the Figure 1-4. For example, MPL-26 has a groundwater elevation of 3880.85 feet; however, MPL-26 is positioned between groundwater

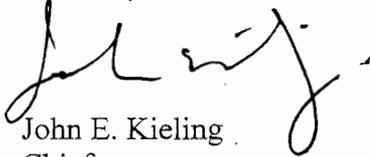
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elevation contours 3860 feet and 3865 feet. In addition, other discrepancies between the elevation contours and elevations listed for wells also were noted. Review the contours for accuracy, as well as the groundwater elevation data and figures to ensure information is correctly presented on the figures.

The Permittee must incorporate all comments contained in this Approval with Modifications into the Work Plan and submit an investigation report prepared in accordance with Appendix 7 of the Permit that summarizes the results of the implementation of the Work Plan no later than **March 29, 2013**.

If you have questions regarding this letter please contact Leona Tsinnajinnie of my staff at (505) 476-6057.

Sincerely,



John E. Kielling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
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File: Reading and WSMR 2012 and HWB-WSMR-11-011