



SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

NEW MEXICO ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.nmenv.state.nm.us



RYAN FLYNN
Cabinet Secretary-Designate

BUTCH TONGATE
Deputy Secretary

TOM BLAINE, P.E.
Director
Environmental Health Division

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 25, 2014

Mr. Thomas A. Ladd, Director
U.S. Army White Sands Missile Range
White Sands Missile Range,
New Mexico 88002-5000

**RE: DISAPPROVAL
RCRA FACILITY INVESTIGATION REPORT
SWMUs 86 AND 87, MAIN POST SANITARY AND
CONSTRUCTION LANDFILLS
WHITE SANDS MISSILE RANGE, NEW MEXICO
EPA ID# NM2750211235
WSMR-13-006**

Dear Mr. Ladd:

The New Mexico Environment Department (NMED) has completed its review of White Sands Missile Range's (Permittee) *RCRA Facility Investigation Report, SWMUs 86 and 87, Main Post Sanitary and Construction Landfills* (Report), dated March 2013. NMED hereby issues this disapproval with the following comments.

Comment 1

In Section 2.2.3 (Current Groundwater Monitoring Program), page 2-9, the Permittee states, "[t]he water quality tables that were submitted with the RFI Work Plan (Shaw, 2012) had indicated the presence of 1,2-dichloroethane in several wells which was commented on by NMED in their approval letter. This caused Shaw to review the past data and determine that the previously indicated 1,2-dichloroethane, was present as a quality control surrogate, not as a true COC, and the analytical results entry were revised accordingly to non-detect." In the revised Report describe the factors that were used to determine that the analyte was a quality control surrogate rather than a detection.

Mr. Thomas A. Ladd
February 25, 2014
Page 2

Comment 2

Figure 6-2 (Potentiometric Surface Map) does not clearly depict the groundwater levels at solid waste management units (SWMUs) 86 and 87; all of the isopleth lines are concentrated around the Sewage Treatment Plant. Additionally, as NMED pointed out in Comment 5 of the June 10, 2012 Approval with Modifications for the Work Plan, the presentation of the groundwater elevation contours is not accurate. Revise the figure to correctly depict the groundwater elevation contours at SWMUs 86 and 87. Ensure that the groundwater contour lines are drawn to correspond to the monitoring well groundwater elevations presented on the figure and ensure that the isopleth lines are at an appropriate scale. Note that there are several sets of nested wells that should be considered when drawing the groundwater contours.

Comment 3

In Section 6.2 (Groundwater Analytical Results), pages 6-2 to 6-3, regarding groundwater monitoring well MPL-06 the Permittee states, “[t]here was an exceedance for nitrate/nitrite in the December 2012 sample. The sample had a reading of 14.4 mg/L for nitrate/nitrite, above the [New Mexico Water Quality Control Commission] NMWQCC standard of 10 mg/L (2002). This result is believed to be an anomaly as this parameter has been consistently well below the standard of 10 mg/L.” The Permittee must continue to sample MPL-06 semi-annually as part of the long-term monitoring for the Sewage Treatment Plant (STP) Ditches, SWMU 82. If the nitrate/nitrite level is not an anomaly, it is likely related to the cyanide plume rather than the landfill. No changes to the Report are necessary.

Comment 4

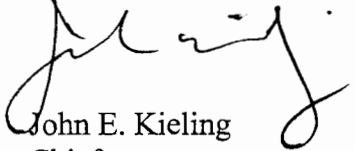
In Section 3.2.1 (Groundwater Sampling), page 3-2, the Permittee states, “[f]ield water quality measurements (pH, specific conductivity, oxidation-reduction potential, dissolved oxygen, turbidity, and temperature) were recorded during purging of the monitoring wells using a field-calibrated YSI water quality meter and a turbidity meter.” Provide a summary table of the field quality parameter measurements.

The Permittee must address all comments in this Disapproval and submit a revised Report. Include a red-line strikeout version showing where all revisions have been made. The revised Report must be accompanied with a response letter that details where all revisions have been made, cross-referencing NMED's numbered comments. The revised Report must be submitted to NMED no later than **May 19, 2014**.

Mr. Thomas A. Ladd
February 25, 2014
Page 3

If you have any questions regarding this letter, please contact Kristen Van Horn at (505) 476-6046.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
N. Dhawan, NMED HWB
K. Van Horn, NMED HWB
L. Tsinnajinnie, NMED HWB
J. Gallegos, WSMR
B. Avalos, WSMR

File: WSMR 2014 and Reading
WSMR-13-006