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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

October 16, 2014

Mr. Thomas A. Ladd, Director
Public Works (Building 102)
US Army Garrison White Sands
White Sands Missile Range,
New Mexico 88002-5000

RE: APPROVAL WITH MODIFICATIONS
REVISED 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) *Revised RCRA Facility Investigation Report, SWMUs 86 and 87, Main Post Sanitary and Construction Landfills* (Report), dated May 2014. NMED hereby issues this Approval with Modifications and provides the following comments.

Comment 1

In the Response to Comments table, regarding NMED's Disapproval Comment 2, the Permittee states, "[t]he version of Figure 6-2 included in the report was originally created to display the potentiometric surface for the Former Sewage Treatment Plant (STP) Ditches (SWMU 82) and did not depict the contours around the MPL in detail. Figure 6-2 will be revised to focus on the area surrounding SWMUs 86 and 87 and additional contours will be added as requested." The groundwater contour maps for the STP Ditches and the landfills should not be significantly different, since the groundwater potentiometric surface likely does not change significantly over the short distance between STP Ditches and the landfills.

Comment 2
In Section 2.1.1 (Site Description and History), page 2-2, the Permittee states, "[t]renches were excavated, waste materials (MSW or C&D) were placed within the unlined cells and the waste was covered with soil per the regulations." In future reports clearly state which regulations were followed regarding placement of the landfill covers.

Comment 3
Table 3-3 (Groundwater Level Measurements, November 2012) should present more information, such as the total depth of the well and the screened interval to provide a more complete picture of the groundwater at the site. In future reports ensure that adequate information is provided in order for readers to evaluate groundwater level measurements.

Comment 4
In Section 6.2 (Groundwater Analytical Results), page 6-2, the Permittee states, "There were no exceedances of the NMWQCC standards (2002) or the EPA MCLs (2012) for any other analytes at monitoring well MPL-03. The duplicate sample from the December sampling event had a nitrate/nitrite concentration (measured as nitrogen) of 11.4 mg/L, above the NMWQCC standard of 10 mg/L. The parent sample had a concentration of 9.86 mg/L, just below the NMWQCC limit. This is the first record of an exceedance (duplicate sample) for this parameter from this well since 2001. The well has always been near the standard, the parent sample has not had an exceedance." Nitrate is a product of cyanide degradation; however, nitrate can also be a product of landfilled municipal waste, the Permittee must continue to monitor well MPL-03.

Comment 5
In Section 6.2 (Groundwater Analytical Results), page 6-2 and 6-3, the Permittee states, "[t]he December 2012 sample from monitoring well MPL-06, a downgradient well, was below the NMWQCC criteria for amenable and total cyanide of 0.2 mg/L with nondetect values. The July 2012 sample had similarly low concentrations of 0.0073 and 0.00913 mg/L (J qualified), respectively. There 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 NMWQCCstandard 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. There were no other exceedances of the NMWQCC standard or the EPA MCLs (2012) for any other analytes at monitoring well MPL-06." There are no wells downgradient from MPL-06. NMED commented on this issue in Comment 3 of the Disapproval letter. If the exceedance of nitrate continues, the Permittee must install additional groundwater monitoring wells downgradient from MPL-06.

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
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