



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

JUN 26 2019



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

Dear Mr. Kieling,

This letter is in response to the New Mexico Environment Department (NMED) Approval with Modifications letter dated March 27, 2019 (HWB-WSMR-18-012) regarding the *Revised Final, Seventh Quarterly Interim Measures Monitoring Report (April 4, 2018 - June 29, 2018) HELSTF TSA Gasoline Spill Site SVE System, SWMU 197*. The NMED requested WSMR to address Comment 1 of the letter with a revised table and an explanation regarding the collected volumes of condensate. Comment 1 of the approval letter states:

"The response to NMED's Comment 4 states "Table 7 [was] added to Report to show cumulative volumes of condensate. Condensate amount [was] corrected to 56.55 gallons." Table 7, Investigation Derived Waste-Liquid Condensate, lists the same collection dates three times for January 16, 2018 and twice for November 9, 2016. Explain why the same collection dates are shown more than once. In addition, one of the recorded volumes is shown as 29.96 gallons that is approximately six times more than the rest of volumes recorded for other dates. Explain why the volume is significantly higher than the rest of the recorded volumes in a response letter. Provide the table with the response letter, revised as necessary."

The discussion below is offered in response to the NMED request.

The three collection dates listed as January 16, 2018 include three separate containers that were filled on that date. The same goes for the two listed November 9, 2016 collection dates. Table 7 has been modified to reflect this and is enclosed with this letter. The 29.96 gallons recorded on January 16, 2018 were collected from draining the moisture knock out when maintenance (ball valve replacement) was being conducted on the system. The moisture was collected in a 30-gallon container plus two additional 5-gallon containers.

If you have any questions regarding this matter, please contact Mr. Benito Avalos of our Environmental Compliance Branch at (575) 678-2225.

I am forwarding a copy of this letter Mr. Michiya Suzuki NMED-HWB; Mr. Dave Cobrain, NMED-HWB; Ms. Laurie King, EPA Region 6; Mr. Walter Migdal, EA Engineering; and Mr. Robert Rowden, AEC.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brian D. Knight", with a large, stylized initial "B" and "K".

Brian D. Knight
Chief, Environmental Division

Table 7 - Investigation Derived Waste - Liquid Condensate Waste

Revised Final, Seventh Quarterly Interim Measures Monitoring Report, SWMU 197 (CCWS-16), HELSTF TSA Gasoline Site

White Sands Missile Range, New Mexico

COLLECTION DATE	TURN IN DATE	WEIGHT (lbs)	VOLUME (gal)	NUMBER OF CONTAINERS	CONTAINER TYPE
10/12/2016	10/18/2016	19	2.28	1	5 gal poly
10/26/2016	10/27/2016	41	4.91	1	5 gal poly
11/9/2016	11/14/2016	40	4.79	1	5 gal poly
		42	5.03	1	5 gal poly
1/16/2018	1/17/2018	41	4.91	1	5 gal poly
		39	4.67	1	5 gal poly
		250	29.96	1	30 gal poly
	TOTAL	472	56.55		