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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**



**James C. Kenney**  
Cabinet Secretary

**Jennifer J. Pruett**  
Deputy Secretary

October 2, 2019

Brian D. Knight  
Chief, Environmental Division  
U.S. Army Garrison, White Sands  
(Building 163)  
White Sands Missile Range, New Mexico 88002-5000

**RE: APPROVAL WITH MODIFICATIONS  
REVISED FINAL INTERIM MEASURES REPORT  
SWMU 197 HELSTF TSA GASOLINE SPILL SITE  
WHITE SANDS MISSILE RANGE, NEW MEXICO  
EPA ID # NM 2750211235  
HWB-WSMR-19-001**

Dear Mr. Knight:

The New Mexico Environment Department (NMED) has reviewed the *Revised Final Interim Measures Report SWMU 197 HELSTF TSA Gasoline Spill Site SVE System* (Report), dated August 2019 submitted on behalf of the U.S. Army White Sands Missile Range (Permittee). NMED hereby issues this Approval with Modifications. The Permittee must address the following comments.

**Comment 1**

In the response to NMED's *Disapproval Comment 14*, the Permittee states, "[t]he bridging mentioned was in the auger flights, which were cleared when they were moved (up 2 ft) and bentonite was placed within the borehole." The statement is confusing. Explain the bentonite bridging within the auger flights and its resolution in more detail in a response letter.

**Comment 2**

NMED's *Disapproval* Comment 30 states that the Permittee must provide a discussion of the cause of increases in benzene, toluene, ethylbenzene and xylenes (BTEX) in the perched wells while the SVE system was in operation. The Permittee's response states that additional corrective action has been recommended in the report. The discussion of the cause of the increases in BTEX is not presented in the Report. Include the discussion in the response letter.

**Comment 3**

In the response to NMED's Disapproval Comment 32, the Permittee states, "[t]he increase in condensate is due to the installation of a larger moisture separator knock out pot (75-gallon) on the replacement SVE unit to collect condensate versus the original unit (15-gallon)." The Permittee emptied the condensate knockout tank on October 26, 2016 and then collected condensate two weeks later on November 9, 2016. The condensate totaled 9.94 gallons. The knockout tank was replaced with the larger tank between November 2016 and February 2017. The system operated during most of 2017; however, condensate volumes were not recorded in 2017. The condensate volume measured on January 16, 2018 totaled 39.54 gallons, presumably accounting for the entire volume accumulated from February 2017 to January 16, 2018. Explain whether the volume recorded on January 16, 2018 represents the cumulative accumulated volume over 11 months. If the knockout tank was not emptied during 2017, the volume recorded on January 16, 2018 appears significantly lower compared to the volumes collected in 2016. Provide a more detailed explanation regarding the reduced condensate volume measured on January 16, 2018. Moreover, the SVE system was not dismantled until June 29, 2018. Table 12 (Investigation Derived Waste – Liquid Condensate Waste) does not provide any record after January 16, 2018. Provide complete data in a revised table.

The Permittee must address all comments in this Approval with Modifications and submit a response letter no later than **December 20, 2019**. Address NMED's *Disapproval* Comments 10, 11, and 28 in the Corrective Measures Evaluation (CME). The CME must be prepared in accordance with Permit Section VI.J and Permit Appendix 7 Section 7.6. As a reminder, the Permittee must submit the required CME Report for NMED review no later than **December 31, 2019**.

This approval is based on the information presented in the document as it relates to the objectives of the work identified by NMED at the time of review. Approval of this document does not constitute agreement with all information or every statement presented in the document.

Mr. Knight  
October 2, 2019  
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If you have questions regarding this Approval with Modifications, please contact Kristen Van Horn of my staff at 505-476-6046.

Sincerely,



John E. Kieling  
Chief  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
K. Van Horn, NMED HWB  
M. Suzuki, NMED HWB  
B. Avalos, WSMR  
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File: WSMR 2019 and Reading  
WSMR-19-001