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CERTIFIED MAIL - RETURN RECEIPT REQUESTED



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James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

May 27, 2020

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

**RE: APPROVAL WITH MODIFICATIONS
2018 GROUNDWATER MONITORING REPORT SWMU 119, STALLION RANGE LANDFILL
SWMU 120, FORMER STALLION CENTER LANDFILL
WHITE SANDS MISSILE RANGE, NEW MEXICO
EPA ID #NM 2750211235
HWB-WSMR-19-008**

Dear Mr. Knight:

The New Mexico Environment Department (NMED) has reviewed the U.S. Army White Sands Missile Range (Permittee) *2018 Groundwater Monitoring Report SWMU 119, Stallion Range Center Landfill SWMU 120, Former Stallion Center Landfill* (Report), dated November 2019. NMED hereby issues this Approval with Modifications. The Permittee must address the following comments.

Comment 1

The Permittee notes in the transmittal letter that the report was prepared in reference to NMED's May 13, 2014 Approval with Modifications Final RCRA Facility Investigation Report SWMUs 119 and 120, Stallion Range Center Landfill. That approval required the Permittee to add SWMU 119 and 120 to the Annual Long-Term Monitoring program for four years and to submit a work plan to survey and measure groundwater levels at the wells at the sites. The Permittee did not comply with either requirement. RCRA Permit Section I.L (Approval of Work Plans and Other Documents) states that upon NMED approval all documents are an enforceable part of the Permit. Failure to comply with NMED direction constitutes noncompliance and may

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be subject to an enforcement action. The Permittee is out of compliance. Work Plan must be submitted no later than **August 31, 2020** to avoid an enforcement action.

Comment 2

In Section 2.2.4 (Site-Specific Groundwater Hydrogeology) the Permittee references a downgradient well more than 10 miles away and upgradient wells located approximately one mile from the landfills but does not discuss the groundwater monitoring wells at the site or the site-specific groundwater elevations. Revise this section to discuss the site-specific groundwater conditions to include groundwater elevations and provide replacement pages and an updated electronic version of the Report no later than **October 1, 2020**.

Comment 3

NMED's Risk Assessment Guidance was updated in February and June 2019 and Table 6-4 now includes a Groundwater Screening Level for gasoline. The screening level for GRO is 10.1 ug/L (0.0101 mg/L). The screening level for unknown oil is now 85.8 ug/L (0.0858 mg/L). Report Table 2 (Groundwater Analytical Results – March 2018 for SWMUs 119 and 120) lists the screening values for GRO and DRO as "Not Established". Ensure that tables in all submittals are updated to correspond to the most recent NMED Guidance screening levels.

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.

The Work Plan to survey the wells and measure groundwater levels at the sites must be submitted no later than **August 31, 2020**. The replacement pages and updated electronic version of the Report must be submitted no later than **October 1, 2020**. The Permittee must submit the 2019 Groundwater Monitoring Report for NMED review no later than **October 31, 2020**.

If you have any questions regarding this correspondence, please contact Dave Cobrain at (505) 476-6055.

Sincerely,



Kevin Pierard
Chief
Hazardous Waste Bureau

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cc: D. Cobrain, NMED HWB
R. Murphy, NMED HWB
B. Avalos, WSMR
L. King, EPA

File: WSMR 2020 and Reading