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CABINET SECRETARY

**Certified Mail - Return Receipt Requested**

August 19, 2021

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

**RE: APPROVAL WITH MODIFICATIONS  
FREQUENT MONITORING PLAN  
SWMU 197, HELSTF TSA GASOLINE SPILL SITE  
WHITE SANDS MISSILE RANGE, NEW MEXICO  
EPA ID #NM 2750211235  
HWB-WSMR-21-009**

Dear Mr. Knight,

The New Mexico Environment Department (NMED) has received the White Sands Missile Range (the Permittee) *Frequent Monitoring Plan SWMU 197, HELSTF TSA Gasoline Spill Site* (Monitoring Plan), dated December 2020 and received May 13, 2021. NMED has reviewed the Monitoring Plan and hereby issues this Approval with Modifications with the following comments.

**NMED COMMENTS**

**1. Section 1.3.9, 2020 Groundwater Monitoring, page 1-8:**

**Permittee Statement:** "Wells HVW-01, HVW-03, . . . were not sampled during the July 2020 monitoring event since they were dry. Well HVW-03 was not sampled during the July 2020 monitoring event due to LNAPL in the well."

**NMED Comment:** There is an error in stating the reason well HVW-03 was not sampled during the July 2020 event. Clarify the reason well HVW-03 was not sampled and provide a replacement page.

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**2. Section 2, Scope of Services, page 2-1:**

**Permittee Statement:** "Groundwater elevations in the perched and regional aquifers as of September 2019 are included in Figures 3 and 4, respectively."

**NMED Comment:** There is an error in reporting the correct monitoring event for the groundwater elevations depicted in Figures 3 and 4. According to Table 2 (Monitoring Well Gauging Data), the groundwater elevations depicted on Figures 3 and 4 are from gauging data collected in February 2020. Correct the statement and provide replacement pages in the appropriate section(s) of the Monitoring Plan.

**3. Table 1 (Monitoring Well and Soil Vapor Well Construction Information) and Table 2 (Monitoring Well Gauging Data):**

**NMED Comment:** Both Tables 1 and 2 include the parameters for *Total Well Depth*, *Screen Top*, and *Screen Bottom* in feet below ground surface (ft bgs) for each well; however, there are inconsistencies between the two tables. For example, in Table 1, the parameters for well HMW-48 are Total Depth = 110 ft bgs; Screen Top = 85 ft bgs; Screen Bottom = 105 ft bgs. In Table 2 the parameters for well HMW-48 are Total Depth = 111.07 ft bgs; Screen Top = 87.78 ft bgs; Screen Bottom = 107.78 ft bgs. Review Tables 1 and 2 to check for additional inconsistencies and provide corrected Tables 1 and 2.

**4. Section 3.1, Data Quality Objectives, Study Area Boundary, page 3-1:**

**Permittee Statement:** "The domain of the decision is limited to the SWMU boundary and evaluation of the analytical parameters for which samples are analyzed and regulatory standards exist."

**NMED Comment:** The boundary for SWMU 197 is not depicted in any of the Monitoring Plan figures. Revise the figures to depict the SWMU boundary and provide replacement pages. Also, the decision to implement corrective measures based on the presence or absence of groundwater contamination in relation to regulatory screening criteria is not limited to the boundary of SWMU 197. For example, downgradient or cross-gradient groundwater contamination outside of the boundary of SWMU 197 that exceeds screening levels is subject to corrective action to meet cleanup standards. Revise the statement and provide a replacement page.

The Permittee must address all comments in this Approval with Modifications. The Permittee must also submit replacement pages as an electronic redline-strikeout version showing where all changes have been made, clean copies of the replacement pages, and a clean electronic version of the revised Monitoring Plan no later than **October 31, 2021**.

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

Should you have any questions, please contact Robert Murphy of my staff at (505) 690-5660.

Sincerely,

A handwritten signature in black ink, appearing to read "Ricardo Maestas", with a long horizontal flourish extending to the right.

Ricardo Maestas  
Acting Chief  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
R. Murphy, NMED HWB  
L. Tsinnajinnie, NMED HWB  
B. Avalos, WSMR  
J. Smith, WSMR  
L. King EPA Region 6 (6LCRRC)

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