



ENTERED

MICHELLE LUJAN GRISHAM
GOVERNOR

JAMES C. KENNEY
CABINET SECRETARY

Certified Mail - Return Receipt Requested

March 9, 2022

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

**RE: DISAPPROVAL
2017 GROUNDWATER FREQUENT MONITORING REPORT
SWMU 197 HELSTF TECHNICAL SUPPORT AREA SPILL SITE
WHITE SANDS MISSILE RANGE, NEW MEXICO
DONA ANA COUNTY, WHITE SANDS MISSILE RANGE, NEW MEXICO
EPA ID #NM 2750211235
HWB-WSMR-20-021**

Dear Mr. Knight,

The New Mexico Environment Department (NMED) has received the U.S. Army White Sands Missile Range (the Permittee, WSMR) *2017 Groundwater Frequent Monitoring Report SWMU 197, HELSTF Technical Support Area Spill Site (Report)*, dated November 2020 and received December 21, 2020. NMED has reviewed the Report and hereby issues this Disapproval with the following comments.

1. Section 2.2, Type of Monitoring, page 2-1:

NMED Comment: The description of low-flow purging in Section 2.2 states that stagnant water was purged at a very low-flow rate that was approximately equal to the recharge rate (e.g., less than 100 mL per minute). The Permittee's statement is inconsistent with Purge Logs in Appendix C which report purge rates greater than 100 mL per minute. Revise the Report to accurately state the groundwater purge rates as described in the field documentation sampling logs.

SCIENCE | INNOVATION | COLLABORATION | COMPLIANCE

Hazardous Waste Bureau - 2905 Rodeo Park Drive East, Building 1, Santa Fe, New Mexico 87505-6313
Telephone (505) 476-6000 - www.env.nm.gov

2. Section 2.4, Regulatory Criteria, page 2-2:

Permittee Statement: “If the criterion is below the achievable laboratory limit of detection, then the screening level is considered to be the laboratory limit of quantitation.”

NMED Comment: Screening levels are not subject to change based on laboratory reporting limits. Analyses conducted with detection limits that are greater than applicable background, screening, and regulatory cleanup levels are considered data quality exceptions and the reasons for the elevated detection limits shall be reported to the NMED in accordance with Permit Appendix 5, Section 5.3. Data quality exceptions that could potentially mask detections must be reported in the analytical data summary tables as specified by Permit Appendix 7, Section 7.4.11 and the limit of quantitation be the reported value for the sample. Revise the statement for accuracy.

3. Section 3.1, Water Levels, page 3-1:

a) **NMED Comment:** The Permittee states that the depth to groundwater was gauged in 20 monitoring wells in March and August 2017. Appendix C does not contain Water Level Field Logs for the March 2017 monitoring event. Revise the Report to provide all of the field data logs for the for the March and August 2017 monitoring and sampling events.

b) **NMED Comment:** The Permittee states that water level measurements were referenced to the surveyed top of casing elevations. Table 1, Monitoring Well Information and Table 2, Groundwater Depths and Elevations report different top of casing elevations for wells HVW-02 through HVW-10. In the case of HVW-03 there is a difference of almost 3 feet between elevations reported in Tables 1 and 2. The Permittee must verify the top of casing elevations for all monitoring wells at SWMU 197. If the elevations cannot be verified then the Permittee must resurvey the wells to eliminate the discrepancies. The Permittee must also revise the Report text, tables, and figures to accurately report all reference elevations, groundwater elevations, and LNAPL elevations.

4. Appendix C, Data:

a) **NMED Comment:** Appendix C includes Field Activity Logs and Water Level Logs for several other SWMUs in addition to SWMU 197. Revise the Report to remove the extraneous field data.

Mr. Knight
March 9, 2022
Page 3

- b) NMED Comment:** Appendix C is missing Laboratory Analysis Reports for many of the wells sampled during the 2017 sampling event at SWMU 197. Revise the Report to include Laboratory Analysis Reports for all of the wells sampled in 2017.

The Permittee must address all comments contained in this Disapproval and submit a revised Report no later than June 31, 2022. The revised Report must include a response letter that details where all revisions have been made, cross-referencing NMED's numbered comments. In addition, an electronic version of the revised Report must be submitted on a CD/DVD that identifies where all changes have been made in red-line strikeout format.

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

Sincerely,

Rick Shean

Digitally signed by Rick
Shean
Date: 2022.03.09 09:17:03
-07'00'

Rick Shean
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)

File: WSMR 2020 and Reading