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GOVERNOR

JAMES C. KENNEY  
CABINET SECRETARY

Certified Mail - Return Receipt Requested



April 13, 2022

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

**RE: DISAPPROVAL  
2019 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-20-023**

Dear Mr. Knight,

The New Mexico Environment Department (NMED) has received the U.S. Army White Sands Missile Range (the Permittee, WSMR) *2019 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.

**Comments**

**1. 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 to be 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

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

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data summary tables as specified by Permit Appendix 7, Section 7.4.11 and the limit of quantitation is considered to be the reported value for the sample. Revise the statement for accuracy.

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

**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. The Permittee must resurvey the wells to eliminate the discrepancies if the top of casing elevations cannot be verified. The Permittee must also revise the Report text, tables, and figures to accurately report all reference elevations, groundwater elevations, and LNAPL elevations.

**3. Appendix C, Data:**

**NMED Comment:** Appendix C is missing Laboratory Analysis Reports for several of the wells sampled during the 2019 sampling event at SWMU 197. Revise the Report to include Laboratory Analysis Reports for all of the wells sampled in 2019.

The Permittee must address all comments contained in this Disapproval and submit a revised Report no later than **June 30, 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: 2022.04.13 08:35:40  
-06'00'

Rick Shean  
Bureau Chief  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
R. Murphy, NMED HWB  
L. Tsinnajinnie, NMED HWB

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B. Avalos, WSMR  
J. Smith, WSMR  
L. King, EPA Region 6 (6LCRRC)

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