



DEPARTMENT OF THE ARMY
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April 30, 2024

Army Environmental Division- BRAC Operations Branch

Mr. Ricardo Maestas
Chief, Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

RE: Response to Approval with Modifications, Groundwater Periodic Monitoring Report, January through June 2022 Revision 1, Fort Wingate Depot Activity, McKinley County, New Mexico. EPA# NM6213820974, HWB-FWDA-23-003

Dear Mr. Maestas:

This letter provides responses to the comments issued in the Approval with Modifications letter from the New Mexico Environment Department (NMED) dated March 11, 2024, HWB-FWDA-23-003 for the Groundwater Periodic Monitoring Report, January through June 2022 Revision 1.

Comments:

1. Permittee's Response to NMED's Disapproval Comment 8, dated October 19, 2023

Permittee Statement: "The Army considers that various reasons for the apparent contradictory readings are possible including introduction of air into the water discharge line; this can increase the instantaneous DO reading, while the ORP measurement is less susceptible to instantaneous changes since it measures a cumulative potential."

NMED Comment: The Permittee's April 19, 2021 letter states, "[d]ownhole probes/sondes are available to measure DO and many other in situ water quality parameters. In situ measurement is a much more effective alternative to displacing air from multiple wells." Although the use of in-situ probes may or may not resolve this recurring issue due to agitation/aeration of groundwater while purging a well, NMED agrees that the Permittee could propose to use downhole probes for water quality measurements, where applicable, in the next groundwater monitoring plan update. Refer to Comment 2 of the NMED's October 26, 2021 *Approval with Modifications Final Groundwater Periodic Monitoring Report, July through December 2019 Revision 1* for details. In the response letter, propose to use downhole probes for water quality measurements, where applicable, in the next groundwater monitoring plan update.

Permittee Response: Concur. The Army will continue to use downhole probes for water quality measurements, where applicable. The Army proposes this provision in Section 4.3.4 of the 2024 Groundwater Monitoring Work Plan.

2. Permittee's Response to NMED's Disapproval Comment 10, dated October 19, 2023

Permittee Statement: "Section 5.2.1 was significantly revised to discuss the findings of each anion."

NMED Comment: Although an electronic red line strikeout (RLSO) version of the Report (i.e., Apr 2022 PMR rev 01_ Text RLSO) was provided in the compact disc (CD), some revisions made to the original March 2023 Report were not presented in the RLSO version of the Report (e.g., Section 5.2.1). The Permittee must provide an electronic RLSO version that presents all of the revisions made to the original reports in all future submittals, as required by NMED. Although resubmission of the RLSO version of the Report is not required, acknowledge this provision in the response letter.

Permittee Response: Concur and acknowledged. The Army will provide an electronic RLSO version that presents all revisions made to the original reports in all future submittals.

3. Permittee's Response to NMED's Disapproval Comment 16, dated October 19, 2023

Permittee Statement: "Appendix G in the July to December 2020 PMR shows the well [BGMW08] is still recharging (water elevation increasing) in the six months between sampling events."

NMED Comment: The statement indicates that the groundwater elevations reported for well BGMW08 have not reached equilibrium. It is necessary to evaluate the equilibrated groundwater elevation in well BGMW08. In the response letter, propose to investigate the equilibrated groundwater elevation in well BGMW08; continue gauging groundwater elevations in well BGMW08, and halting purging/sampling until the investigation is complete. In addition, include this provision in the next groundwater monitoring plan update.

Permittee Response: Concur. The Army will investigate the equilibrated groundwater elevation in well BGMW08 and present data and recommendations for future monitoring at this well. The Army will continue gauging groundwater elevations in well BGMW08 and will halt purging/sampling until the investigation is complete. No purging or sampling will be performed during the 2024 monitoring events, as directed by NMED. This provision will be included in the 2024 Groundwater Monitoring Work Plan Rev. 1, to be submitted by April 30, 2024.

If you have questions or require further information, please contact me at George.h.cushman.civ@army.mil, 703-455-3234 (Temporary Home Office, preferred) or 703-608-2245 (Mobile) or Cheryl.a.frischkorn.civ@army.mil, 703-624-6429 (Mobile).

Sincerely,

George H. Cushman IV

George H. Cushman IV
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Fort Wingate Depot Activity
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Enclosures

CF:

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