



State of New Mexico **ENTERED**
ENVIRONMENT DEPARTMENT



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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

December 15, 2017

Mark Patterson
BRAC Environmental Coordinator
Fort Wingate Depot Activity
13497 Elton Road
North Lima, OH 44452

Steve Smith
USACE
CESWF-PER-DD
819 Taylor Street, Room 3B06
Fort Worth, TX 76102

**RE: APPROVAL WITH MODIFICATIONS
FINAL REVISION 1 GROUNDWATER PERIODIC MONITORING REPORT
JANUARY THROUGH JUNE 2016
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-16-013**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *Final Revision 1, Groundwater Periodic Monitoring Report January through June 2016* (Report), dated November 2017. NMED has reviewed the Report and hereby issues this Approval with Modifications.

1. The Permittee’s Response to Comment 2.g of the Disapproval

Permittee Statement: “Screening and cleanup levels had not been established for delta-hexachlorocyclohexane (delta-bhc) when the report was prepared. The laboratory limit of detection (LOD) as reported in the laboratory data files (Appendix C – Attachment 2) is 0.021 ug/L. The detected concentration is below the LOD. EPA Regional Screening Levels were established for delta-bhc in 2017. The 2017 screening levels were added to Table 5-7. The report text was revised to state that the detected concentration was below the screening

level.”

NMED Comment: Table 5-7, *Summary of Pesticides Analytical Results*, does not include the screening level of delta-hexachlorocyclohexane (delta-bhc). The screening level of beta-hexachlorocyclohexane (beta-bhc) is 0.25 ug/L. Revise Table 5-7 to include the screening level of delta-bhc. In addition, the laboratory data files in Appendix C, Attachment 2, contain multiple analytical reports, which are not relevant to pesticides analysis. Provide a reference to the relevant information (e.g., file name, job number) in a response letter.

2. The Permittee's Response to Comment 6 of the Disapproval

Permittee Statement: “The reductive dechlorination pathway for 1,2-dichloroethane is to chloroethane and subsequently ethane. Vinyl chloride is the reductive dechlorination daughter product of cis-1,2-dichloroethene... There is no indication that vinyl chloride is accumulating at the site.”

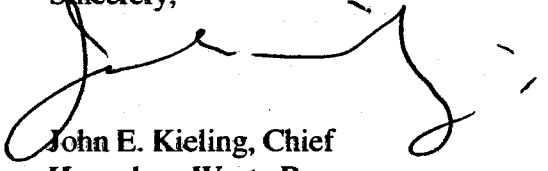
NMED Comment: Although the Permittee's statement is true, it should be noted that incomplete biodegradation of 1,2-dichloroethane does produce vinyl chloride. No revisions are necessary.

The Permittee must address all comments contained in this Approval with Modifications in all future reports and work plans. A response letter addressing Comment 1 must be submitted no later than **March 30, 2018**.

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Should you have any questions, please contact Ben Wear of my staff at (505) 476-6041.

Sincerely,



**John E. Kieling, Chief
Hazardous Waste Bureau
New Mexico Environment Department**

cc: D. Cobrain, NMED HWB
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File: FWDA 2017 and Reading, Groundwater, FWDA-16-013