CERTIFIED MAIL – RETURN RECEIPT REQUESTED

November 10, 2022

NM Dept of Military Affairs
Former Belen Armory Remediation Site
47 Bataan Boulevard
Santa Fe, NM

RE: Draft Discharge Permit, DP-1950, Former Belen Armory Remediation Site

Dear Byron Kesner:

The New Mexico Environment Department (NMED) hereby provides notice to Former Belen Armory Remediation Site of the proposed approval of Ground Water Discharge Permit, DP-1950, (copy enclosed), pursuant to Subsection H of 20.6.2.3108 NMAC. NMED will publish notice of the availability of the draft Discharge Permit in the near future for public review and comment and will forward a copy of that notice to you.

Prior to making a final ruling on the proposed Discharge Permit, NMED will allow 30 days from the date the public notice is published in the newspaper for any interested party, including the Discharge Permit applicant, i.e., yourself, to submit written comments and/or a request a public hearing. A hearing request shall set forth the reasons why a hearing is requested. NMED will hold a hearing in response to a timely hearing request if the NMED Secretary determines there is substantial public interest in the proposed Discharge Permit.

Please review the enclosed draft Discharge Permit carefully. Please be aware that this Discharge Permit may contain conditions that require the permittee to implement operational, monitoring or closure actions by a specified deadline.

Please submit written comments or a request for hearing to my attention at the address below, via email to Aracely.tellez@env.nm.gov or to pps.general@state.nm.us, or directly into the NMED Public Comment Portal at https://nmed.commentinput.com/comment/search. If NMED does not receive written comments or a request for hearing during the public comment period, the draft Discharge Permit will become final.

Thank you for your cooperation during the review process. Feel free to contact me with any questions at (505) 629-8864.

Sincerely,

Aracely Tellez, Environmental Scientist
Encl: Draft Discharge Permit, DP-1950

NEW MEXICO ENVIRONMENT DEPARTMENT
GROUND WATER QUALITY BUREAU

UNDERGROUND INJECTION CONTROL

GENERAL DISCHARGE PERMIT

Certified Mail- Return Receipt Requested

Facility Name:	**Former Belen Armory Remediation Site**
Facility Location:	**715 S. Main Street, Belen, NM 87002 Belen Grant, T5N, R2E Valencia**
Legally Responsible Party:	**NM Dept of Military Affairs 47 Bataan Boulevard, Santa Fe, NM 87508 505-365-4406 (Byron Kesner)**
Remediation Oversight Agency Contact:	**Petroleum Storage Tank Bureau Michael Leger 505-372-8337**
Remediation or Injection Plan Identification:	**See Attached ORC-A Injection Plan**
Permitting Action:	**New**
PPS Contact	**Aracely Tellez 505-629-8864**
EFFECTIVE DATE: XX/XX/XXX	**TERM ENDS: XX/XX/XXXX**

Justin D. Ball
Chief, Ground Water Quality Bureau

[Subsection H of 20.6.2.3109 NMAC, NMSA 1978, § 74-6-5.I]

I. UIC GENERAL DISCHARGE PERMIT

The New Mexico Environment Department (NMED) Ground Water Quality Bureau (GWQB) issues this Underground Injection Control General Discharge Permit (UIC Permit) for the subsurface emplacement of additive fluids through a ~~Class V UIC injection well~~ direct-push borings for the purpose of facilitating vadose zone or groundwater remediation. The GWQB issues this UIC Permit to New Mexico Department of Military Affairs, State Armory Board (Permittee) pursuant to the New Mexico Water Quality Act (WQA), NMSA 1978 §§74-6-1 through 74-6-17, and the New Mexico Water Quality Control Commission (WQCC) Ground and Surface Water Protection Regulations, 20.6.2 NMAC.

In issuing this UIC Permit, the GWQB has determined that the requirements of Subsection C of 20.6.2.3109 NMAC have been met. The activities authorized by this UIC Permit are principally governed by the attached ORC-A injection plan dated June 30, 2022 (Injection Plan), under the authority of 20.5.119 NMAC CORRECTIVE ACTION FOR STORAGE TANK SYSTEMS CONTAINING PETROLEUM PRODUCTS, with oversight by the Petroleum Storage Tank Bureau. Compliance with this UIC Permit requires compliance with the terms, requirements, and conditions of the Injection Plan. The term of this UIC Permit shall be no longer than five years from the effective date of this UIC Permit.

The injection activities, the location of the injection site, the type of injection and quantities of additives being used are briefly described as follows:

Injection Activities (summary: including injection well type, number of wells, and injection frequency)

Copy of the Injection Plan Attached (required): See Attached ORC-A Injection Plan

The attached injection plan describes methods to inject ORC-A using 11 direct-push borings around MW-13R and 11 direct-push borings around MW-17 to remediate dissolved manganese concentrations that exceed the NMWQCC standard in both monitor wells. The Former Belen Armory is a petroleum storage tank site where all petroleum contaminants have been remediated below standards. However, dissolved manganese remains elevated in MW-13R and MW-17, preventing site closure from NMED-PSTB.

Injection Site Information

Depth to groundwater: MW-13R: 13 ft MW-17: 12.5 ft

Existing total dissolved solids concentration (TDS) in groundwater: 1,700 mg/L (SC = 2,500 µS/cm)

Location: Former Belen Armory (Parking Lot South of Maintenance Shop)

County: Valencia

Latitude: 34.654010

Longitude: 106.789973

Map Showing Area of Injection Sites Attached (required) – See Attached Map

Additives Being Used (including volumes, manufacturer, and mixing ratios)

ORC-Advanced (ORC-A) manufactured by Regenesis
Mass and Volume Injected Around MW-13R = 400 pounds / 130 gallons
Mass and Volume Injected Around MW-17 = 400 pounds / 130 gallons
Mixing Ratio = 3.57 pounds ORC-A per gallon of water

Anticipated Precipitation, Dissolution, Adsorption, and Desorption Products

Precipitation of dissolved Mn and Fe
Increased dissolved oxygen, oxidation-reduction potential and pH
No indicated adsorption or desorption products

Objective is to increase dissolved oxygen and support natural aerobic processes to decrease dissolved manganese concentrations that resulted from anaerobic biodegradation of petroleum hydrocarbons. All petroleum contaminants have been remediated to below NMWQCC standards. However, dissolved manganese remains above the NMWQCC standard, preventing site closure approval from PSTB.

See Attached "In-Situ Remediation Data Interpretation Matrix" for in-situ geochemical effects of ORC-A injection, prepared by Regenesis.

Public Notice Posting Locations

2 inch by 3 inch Newspaper Ad required for Renewal applications.
Newspaper: N/A

3 inch by 4 inch Newspaper Ad required for New, Modification, and Renewal/Modification applications.
Newspaper: Valencia County News-Bulletin

2 feet by 3 feet sign posted for 30 days in a location conspicuous to the public at or near the facility required for New, Modification, and Renewal/Modification applications.
Sign Location: Entrance to 715. S. Main, Facing Main Street and Plainly Visible to Public

8.5 inch by 11 inch or larger posted off-site location conspicuous to the public (e.g. public library). Required for New, Modification, and Renewal/Modification applications.
Flyer Location: Belen Public Library, 333 Becker Avenue, Belen, NM 87002

This UIC Permit consists of the complete and accurate completion of this UIC Permit form as determined by the GWQB.

Issuance of this UIC Permit does not relieve the Permittee of the responsibility to comply with the WQA, WQCC Regulations, and any other applicable federal, state and/or local laws and regulations, such as zoning requirements and nuisance ordinances.

Signature must be that of the person listed as the legally responsible party on this application.

I, the applicant, attest under penalty of law to the truth of the information and supporting documentation contained in this application for an Underground Injection Control General Discharge Permit.

Applicant's Signature

Signature:	KESNER.BYRON.TED.1413471067 Digitally signed by KESNER.BYRON.TED.1413471067 Date: 2022.06.30 14:15:37 -06'00'	Date:	30-June-2022
Printed Name:	Byron T. Kesner	Title:	Environmental Specialist

II. FINDINGS

In issuing this UIC Permit, GWQB finds:

1. The Permittee is injecting fluids so that such injections will move directly or indirectly into groundwater within the meaning of Section 20.6.2.3104 NMAC.
2. The Permittee is injecting fluids so that such fluids will move into groundwater of the State of New Mexico which has an existing concentration of 10,000 mg/L or less of TDS within the meaning of Subsection A of 20.6.2.3101 NMAC.
3. The Permittee is using a Class V UIC boring as described in 20.6.2.5002(B)(5)(d)(ii) NMAC for in situ groundwater remediation by injecting a fluid that facilitates vadose zone or groundwater remediation.
4. The Permittee is injecting fluids into groundwater in order to achieve the remediation goals identified in the Injection Plan.

III. AUTHORIZATION TO DISCHARGE

The Permittee is authorized to inject chemical additives into groundwater in accordance with this UIC Permit and the Injection Plan under the oversight of Petroleum Storage Tank Bureau, Remedial Action Program.

[20.6.2.3104 NMAC, Subsection C of 20.6.2.3106 NMAC, Subsection C of 20.6.2.3109 NMAC]

IV. CONDITIONS

The conditions of this UIC Permit shall be complied with by the Permittee and are enforceable by GWQB.

1. The Permittee shall perform remediation activities in accordance with the Injection Plan and shall notify GWQB of any changes prior to making them.

   [20.6.2.3107 NMAC]

2. The Permittee shall monitor the injection activities and their effects on groundwater quality as required by the Injection Plan and shall provide GWQB with electronic copies of the required reporting and any pertinent documentation of activities at the site.

   [20.6.2.3107.A NMAC, 20.6.2.3109.A NMAC]

3. If the GWQB or the Permittee identifies any failure of the Injection Plan or this UIC Permit to comply with 20.6.2 NMAC not specifically noted herein, GWQB may require the Permittee to submit a corrective action plan and a schedule for completion of corrective actions to address the failure.

   Additionally, the GWQB may require the Permittee to submit a proposed modification to the Injection Plan, this UIC Permit, or both.

   [20.6.2.3107.A NMAC, 20.6.2.3109.E NMAC]

4. ADDITIONAL MONITORING REQUIREMENTS – (RESERVED) - Placeholder for any added monitoring and reporting requirements.

5. TERMINATION – Within 30 days of completion of activities authorized by this UIC Permit the Permittee shall submit a closure report and a request to terminate the UIC Permit to the GWQB for its approval. The closure report shall identify how the injection well(s) was (were) closed in accordance with the Injection Plan. The Permittee shall provide Petroleum Storage Tank Bureau, Remedial Action Program. with a copy of this closure report.
   [20.6.2.5005 NMAC, 19.27.4 NMAC]

6. INSPECTION and ENTRY – The Permittee shall allow a representative of the NMED to inspect the facility and its operations subject to this UIC Permit and the WQCC regulations. The GWQB representative may, upon presentation of proper credentials, enter at reasonable times upon or through any premises in which a water contaminant source is located or in which are located any records required to be maintained by regulations of the federal government or the WQCC.

   The Permittee shall allow the GWQB representative to have access to, and reproduce for their use, any copy of the records, and to perform assessments, sampling or monitoring during an inspection for the purpose of evaluating compliance with this UIC Permit and the WQCC regulations.

   Nothing in this UIC Permit shall be construed as limiting in any way the inspection and entry authority of GWQB under the WQA, the WQCC Regulations, or any other local, state, or federal regulations.

   [20.6.2.3107.D NMAC, NMSA 1978, §§ 74-6-9.B and 74-6-9.E]

7. MODIFICATIONS and/or AMENDMENTS – In the event the Permittee proposes a change to the injection plan that would result in a change in the volume injected; the location of the injections; or the concentration of the additives being injected by the facility, the Permittee shall notify GWQB prior to implementing such changes. The Permittee shall obtain approval (which may require modification of this UIC Permit) by GWQB prior to implementing such changes.

[20.6.2.3107.C NMAC, 20.6.2.3109.E and G NMAC]

8. COMPLIANCE with OTHER LAWS – Nothing in this UIC Permit shall be construed in any way as relieving the Permittee of the obligation to comply with all applicable federal, state, and local laws, regulations, permits, or orders.

   [NMSA 1978, § 74-6-5.L]

9. PERMIT FEES – Payment of permit fees is due at the time of UIC Permit approval. Permit fees shall be paid in a single payment remitted to GWQB no later than 30 days after the UIC Permit effective date.

   Permit fees are associated with issuance of this UIC Permit. Nothing in this UIC Permit shall be construed as relieving the Permittee of the obligation to pay all permit fees assessed by GWQB. A Permittee that ceases injecting or does not commence injecting during the term of the UIC Permit shall pay all permit fees assessed by GWQB. An approved UIC Permit shall be suspended or terminated if the facility fails to remit a payment by its due date.

   [20.6.2.3114.F NMAC, NMSA 1978, § 74-6-5.K]