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August 28, 2017

Bartolome J. Cañellas  
Remedial Project Manager  
U.S. EPA – Region 6  
1445 Ross Ave., Ste. 1200  
Dallas, TX 75202-2733

Re: Water Authority Concerns Regarding the Proposed Plan for Record of Decision (ROD) Amendment for the Fruit Avenue Plume Superfund Site, Albuquerque, NM

Dear Mr. Cañellas:

The Albuquerque Bernalillo County Water Utility Authority (Water Authority) would like to thank you and your contractors for the meeting with Water Authority and City of Albuquerque staff prior to the public meeting on August 15, 2017. We greatly appreciate your efforts with respect to the Fruit Avenue Superfund Site. However, we would be remiss if we did not take this opportunity to reiterate the concerns expressed during the meeting and bring to your attention additional concerns regarding the status of this site as it heads into a decades-long Monitored Natural Attenuation (MNA) phase.

### Opposition to MNA

As you are aware, the Water Authority does not support the implementation of MNA at this time at the Fruit Avenue site. We believe an effort to actively remove the remaining contamination is still appropriate given the mass of the solvent plume. MNA has shown itself to be problematic for water utilities in other urban areas, rendering portions of aquifers unusable and forcing the precautionary shutdown of drinking water production wells.

According to the most recent data, the plume (Fig. 1) continues to migrate closer to downgradient drinking water wells at the University of New Mexico and the Water Authority's Yale well field. While the Fruit Avenue Plume is not an immediate threat to the community's drinking water supply, it certainly could become one if natural attenuation fails to perform as hoped. At a minimum, the continued existence of the plume hinders the Water Authority's ability to construct new production wells in the vicinity, which may be necessary as existing wells are taken out of service due to age.

### West Central Avenue – Albuquerque Site

It should be noted that as the EPA is planning to remove the pump-and-treat system for the Fruit Avenue Plume, new contamination from the West Central Avenue-Albuquerque Site (CERCLIS #NMN000607327) is encroaching into this area (Fig. 2). It would seem appropriate to consider the use of any equipment already

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onsite in Albuquerque to address this potentially new Superfund site. The additional solvent mass may greatly affect the Fruit Avenue Plume and leave a much larger swath of Albuquerque's aquifer unusable if MNA is the intended solution for both sites.

### **Groundwater Still a Significant Source of Supply**

Finally, the Water Authority takes issue with EPA's statement during our meeting suggesting that the increased use of surface water by the Water Authority should diminish the utility's concerns about groundwater quality and availability.

On the contrary, the Water Authority's long-term water resources management strategy relies heavily on the availability of high-quality groundwater as a foundational element of our supply portfolio. Minimizing the aquifer's importance indicates a fundamental lack of understanding of the water supply issues facing the arid desert community of Albuquerque and Bernalillo County.

### **Conclusion**

The Water Authority and its ratepayers should be commended for their successful management of local water resources through strategic implementation of conjunctive-use measures and conservation. The gains made in this community in terms of a rebounding aquifer will allow us to stretch a limited water supply and increase its resiliency over several generations. The ability to do this is jeopardized when the resource is needlessly squandered through slow and/or misguided cleanup efforts. Groundwater is still a significant source of the drinking water supply in Albuquerque, and will be well into the future.

Having said that, we would like to cordially extend an invitation to you or other EPA representatives to provide an update on the Fruit Avenue Site to the Water Authority's Governing Board at one of their upcoming meetings in 2017 or early 2018. The last such update was in March of 2010, so given the milestone the site has reached, this would certainly be an appropriate time for a status report

Please feel free to contact me if you have any questions at (505) 289-3025.

Sincerely,



Rick Shean, Water Quality Hydrologist  
Albuquerque Bernalillo County Water Utility Authority

### **Attachments**

cc: Mark S. Sanchez, Executive Director  
Mr. Sabino Rivera, New Mexico Environment Department  
Mr. Bart Faris, City of Albuquerque Environmental Health Department



Figure 1: Map of trichloroethene (TCE) plume at aquifer depth interval 2 (D2; 4,752 to 4,647 feet above mean sea level) with defined (solid line) and inferred (dashed line) plume boundary showing concentrations of TCE greater than 5 micrograms per liter in February 2017. Table summarizes the detected concentrations (=) in micrograms per liter of TCE found at monitoring well 4 (MNW-4 (D2)) from 2008 to 2017. Map created by Kate Mendoza, August 2017.



Figure 2: Map of the West Central Avenue trichloroethene (TCE) plume encroaching on Fruit Avenue Plume Superfund site. Defined (solid line) and inferred (dashed line) plume boundary showing concentration of TCE greater than 5 micrograms per liter in 2015. Map created by Kate Mendoza, August 2017.