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NEW MEXICO
ENVIRONMENT DEPARTMENT

Ground Water Quality Bureau

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ENTERED



RON CURRY
Secretary
JON GOLDSTEIN
Deputy Secretary

June 23, 2009

Mr. Wayne Bitner
United States Air Force
377 ABW/EMR
2050 Wyoming Blvd. SE
Kirtland AFB
Albuquerque, New Mexico 87117-5270

Re: NMED Notice of Deficiency for Modified Stage 2 Abatement Plan Schedule of Activities for Kirtland SS-111 Bulk Fuel Facility at Kirtland Air Force Base (KAFB), Albuquerque, New Mexico

The New Mexico Environment Department (NMED) Ground Water Quality Bureau disapproves the proposed phased schedule of activities dated February 12, 2009, that was submitted by the U.S. Air Force to this office for review on February 17, 2009. NMED hereby notifies you that the above-referenced document is deficient for the following reasons:

1. In its proposal, KAFB uses "FY09, FY10, FY11, & FY12" in describing annual cycles for work to be completed. All work commitments need to cite the specific calendar dates by which they will be initiated and completed.
2. KAFB proposes a three-year time horizon for implementing dissolved-phase Stage 2 Abatement plan at SSS-111. NMED does not approve of the extended period of time proposed for this activity. NMED requires that no more than 120 days shall pass between completion of the dissolved-phase investigation and submittal of a Stage 2 AP for the full-scale abatement of off-base dissolved phase ground water contamination.
3. NMED expects that off-base remediation activities, including both LNAPL recovery *and* dissolved-phase ground water remedial action, will be undertaken at the soonest practicable juncture. The proposed schedule does not reasonably accomplish this goal.

NMED requires that KAFB submit a revised document to cure the deficiencies listed above. Please submit a revised document to NMED by July 24, 2009.

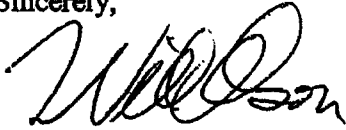
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Mr. Wayne Bitner
June 23, 2009
Page 2

NMED thanks you for your on-going cooperation in this matter. If you have any questions about this letter, please contact Alex Puglisi at (505) 827-2754 or Baird Swanson, Project Manager, at (505) 222-9520.

Sincerely,



William C. Olson, Chief
Ground Water Quality Bureau

Cc: Alex Puglisi, GWQB/ROS Program Manager
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Baird Swanson, NMED District 1 File
Reading file