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NEW MEXICO
ENVIRONMENT DEPARTMENT



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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

February 18, 2016

Colonel Eric H. Froehlich
Base Commander
377 ABW/CC
2000 Wyoming Blvd. SE
Kirtland AFB, NM 87117-5606

John Pike
Director, Environmental Management Services
377 MSG
2050 Wyoming Blvd. SE, Suite 116
Kirtland AFB, NM 87117-5270

**Re: FACILITY INVESTIGATION DERIVED WASTE STORAGE AREA
DISCHARGE INVESTIGATION WORK PLAN,
BULK FUELS FACILITY SPILL
SOLID WASTE MANAGEMENT UNITS ST-106 AND SS-111
KIRTLAND AIR FORCE BASE
EPA ID#NM9570024423, HWB-KAFB-13-MISC**

Dear Colonel Froehlich and Mr. Pike:

The New Mexico Environment Department (NMED) has received the U.S. Air Force's (Permittee) work plan *Facility Investigation Derived Waste Storage Area Discharge Investigation Work Plan, Bulk Fuels Facility, Kirtland Air Force Base, New Mexico* dated January 19, 2016. This work plan proposes a soil investigation where groundwater monitoring purge water with constituents exceeding the New Mexico Water Quality Control Commission (NMWQCC) regulations or U.S. Environmental Protection Agency (EPA) maximum contaminant levels (MCLs) was discharged to the ground surface. The work plan only addresses the discharge of water from First Quarter 2014.

The NMED is disapproving the IDW Investigation Work Plan based on the deficiencies discussed below. No further review of the work plan will be completed until a revised document is submitted.

1. The NMED notified the Permittee that a discharge permit was required for groundwater monitoring purge water in five letters dated: November 23, 2010; April 8, 2011; May 24,



2011; June 1, 2011; and December 22, 2014. To date, the Permittee has not provided documentation to establish the fate of the water referenced in the letters. If the purge water was transported off-site for disposal, the Permittee must submit a separate letter to inform the NMED of the final disposition of the water. In the case(s) where the purge water was discharged to the ground surface, the soil investigation work plan should address the groundwater monitoring purge water, providing documentation on the fate of the water and inclusion of the discharge area in the investigation.

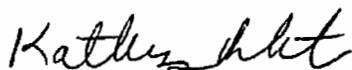
2. Because of perceived minimal impact to groundwater quality the NMED has allowed temporary surface discharge of fluids with constituents at concentrations greater than NMQCC or EPA MCLs at the Bulk Fuels Facility (BFF) fuel leak project. The NMED also allowed the discharge of fluids with detectable concentrations of constituents, though below the NMQCC levels or EPA MCLs. These discharged fluids have been associated with 1) decontamination of drilling equipment; 2) well development water; and 3) groundwater monitoring purge water. Although the impact is likely minimal, it is possible that constituents have accumulated in the soil and therefore impact to the soil should be investigated.

In addition to addressing the deficiencies discussed above, the NMED is requesting the work plan be revised to address the following actions:

1. The Permittee needs to perform a records review to produce a comprehensive list of analytes. The scope of the soil investigation needs to be expanded to include all metals and organic constituents identified through records review for IDW water discharged to the "IDW Storage Area – discharge footprint."
2. If the discharge footprint described in the work plan does not include all surface discharged to date on the BFF fuel leak project site, the investigation needs to be expanded to include the full discharge footprint.

Should you have any questions regarding this letter please contact Diane Agnew of my staff at (505) 222-9555.

Sincerely,



Kathryn Roberts
Director
Resource Protection Division

KR/DA

Cc: Col. T. Haught, KAFB
K. Lynnes, KAFB
A. Bodour, KAFB-AFCEC

Col. Froehlich and Mr. Pike

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File: KAFB 2015 Bulk Fuels Facility Spill