

 **ENTERED**



SUSANA MARTINEZ  
Governor

JOHN A. SANCHEZ  
Lieutenant Governor

**NEW MEXICO  
ENVIRONMENT DEPARTMENT**

**2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303  
Phone (505) 476-6000 Fax (505) 476-6030  
www.env.nm.gov**



BUTCH TONGATE  
Cabinet Secretary

J. C. BORREGO  
Deputy Secretary

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

April 27, 2017

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

Lieutenant Colonel Wayne J. Acosta  
Civil Engineer Office  
377 Civil Engineering Division  
2050 Wyoming Blvd SE, Suite 116  
Kirtland AFB, NM 87117-5270

**RE: MODIFICATION REQUEST TO THE WORK PLAN FOR SOIL VAPOR AND DRINKING  
WATER MONITORING, AUGUST 2016  
SOLID WASTE MANAGEMENT UNIT ST-106/SS-111  
KIRTLAND AIR FORCE BASE  
EPA ID# NM9570024423, HWB-KAFB-13-MISC**

Dear Colonel Froehlich and Lt. Colonel Acosta:

The New Mexico Environment Department (“NMED”) is in receipt of the Kirtland Air Force Base (“KAFB” or the “Permittee”) request for modification to *Work Plan for Soil Vapor Monitoring and Drinking Water Monitoring, August 2016* (“Work Plan”), dated April 3, 2017. The Permittee is requesting to discontinue analysis of ethylene dibromide (“EDB”) in soil vapor by Method California Air Resource Board (“CARB”) 422 for soil vapor monitoring events. The Summary Memorandum (“Memo”) attached to the Work Plan documents lower detection limits for EDB by TO-15 in the majority of soil vapor samples. Additionally, the Memo documents that results for EDB from method CARB 422 were biased high compared to the TO-15 method. The Permittee is requesting to continue to use United States Environmental Protection Agency (“EPA”) Method TO-15 for the analysis of EDB in soil vapor.

In the Memo, the Permittee identifies ten quarterly reports, submitted to NMED, that present EDB results using method CARB 422. The Resource Conservation Recovery Act Facility



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Investigation ("RFI") Report submitted to NMED in January 2017 also presents EDB results from method CARB 422.

The Permittee has used the TO-15 method in conjunction with the CARB 422 method. The TO-15 method is considered more reliable than method CARB 422 after reviewing the results and data quality. Therefore, NMED is approving the request and requiring the Permittee to submit replacement pages to the RFI Report providing EDB results from the TO-15 method in the figures, tables, and text. Revisions to the previously submitted quarterly reports, and identified in the Memo, are not required. Future quarterly reports and submittals shall present the results of the TO-15 method beginning with the Second Quarter 2017 sampling event.

If you have any questions regarding this letter, please contact Diane Agnew at (505) 222-9555.

Sincerely,



Juan Carlos Borrego  
Deputy Secretary  
Environment Department

cc: Col. M. Harner, KAFB  
K. Lynnes, KAFB  
A. Bodour, KAFB-AFCEC  
T. Simpler, USACE  
M.L. Leonard, AEHD  
F. Shean, ABCWUA  
L. King, EPA-Region 6 (6PD-N)  
J. Kieling, NMED-HWB  
D. Agnew, NMED-GWQB  
S. Pullen, NMED-GWQB  
M. Hunter, NMED-GWQB

File: KAFB 2017 Bulk Fuels Facility Spill