



DEPARTMENT OF THE AIR FORCE  
377TH AIR BASE WING (AFGSC)

ENTERED

MAY 16 2018

Colonel Richard W. Gibbs, USAF  
Commander  
377th Air Base Wing  
2000 Wyoming Blvd SE  
Kirtland AFB NM 87117

Mr. John Kieling, Bureau Chief  
Hazardous Waste Bureau (HWB)  
New Mexico Environment Department (NMED)  
2905 Rodeo Park Drive East, Building 1  
Santa Fe NM 87505-6303



Dear Mr. Kieling

In response to NMED's letter dated 23 April 2018, the Air Force (AF) is pleased to submit responses to conditions outlined in the above referenced letter.

Condition 1: "*FEFLOW is a proprietary model that requires purchase of a license for full application. The Permittee shall describe in sufficient detail how it will:*"

1a) "*oversee its contractor's use of FEFLOW and ensure that the contractor performs FEFLOW modeling in accordance with acceptable industry practices and standards;*"

The AF has Subject Matter Experts employed at the Air Force Civil Engineer Center Technical Division that will be part of the internal review and approval process who will provide oversight of the contractor and ensure that they perform FEFLOW modeling in accordance with acceptable industry practices and standards.

1b) "*provide NMED, upon request, with access to FEFLOW so that NMED can evaluate the modeling results;*"

The AF confirmed in the 04 April 2018 Modeling Technical Working Group (TWG) meeting that the cooperative agreement between the AF and NMED allows NMED to hire a modeling contractor to evaluate modeling reports as needed to support regulatory oversight. It is our understanding that NMED has contracted with Daniel B. Stevens Associates (DBSA) to provide modeling regulatory support and that DBSA will be attending the 14 June 2018 TWG meeting.

1c) "*provide public transparency for use of the FEFLOW model in plume capture analysis.*"

As presented in the 24 April 2018 TWG meeting, there is an open source, free FEFLOW reader that is available to interested stakeholders. The AF will present a plume capture modeling overview at the 12 July 2018 public meeting and will present the first run of the FEFLOW plume capture model using BFF data at the 15 November 2018 public meeting. A modeling deep dive will also be held in conjunction with the November 2018 public meeting.

KAFB4675



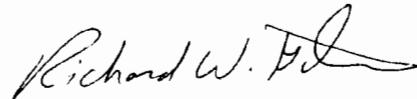
In addition, Condition 3 states that; "*The Permittee shall include performance assessment of plume capture, including FEFLOW simulation results, in semiannual reports submitted and subject to NMED*

*Approval.*" The AF agrees with this condition and commits to including performance assessment and FEFLOW simulation results in future semiannual reports starting with the Q2 2018 report, with anticipated delivery on (or before) 30 September 2018.

The AF is committed to complying with Kirtland Air Force Base's Resource Conservation and Recovery Act Permit and appreciates NMEDs understanding and cooperation in helping to achieve this goal.

If you have any questions or concerns, please contact Mr. Christopher Segura at (505) 853-5443 or at christopher.segura.2@us.af.mil; or Mr. Scott Clark at (505) 846-9017 or at scott.clark@us.af.mil.

Sincerely



RICHARD W. GIBBS, Colonel, USAF  
Commander

cc:

NMED (Borrego) letter

NMED-OOTS (McQuillan), letter and CD

NMED GWQB (Hunter), letter and CD

EPA Region 6 (King, Ellinger), letter and CD

COA (Faris), letter and CD

ABCWUA (Shean), letter and CD

SAF-IEE (Lynnes), electronic only

AFCEC/CZ (Renaghan, Clark, O'Grady, Segura), electronic only

USACE-ABQ District Office (Simpler, Phaneuf, Dreeland, Sanchez, Salazar), electronic only

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