



KAFB  
ST-106, ST-111  
Bulk Fuels Facility Spill  
Q2/CY2012 Qtr Rpt

**Cobrain, Dave, NMENV**

**From:** Moats, William, NMENV  
**Sent:** Tuesday, September 17, 2013 11:34 AM  
**To:** Cobrain, Dave, NMENV  
**Cc:** McDonald, William, NMENV; Brandwein, Sid, NMENV  
**Subject:** RE: NOD Comments 2nd Qt 2012

*CBBI/USACE Response  
to NMED Comments -  
Assessment of RTCs*

Dave,

I have read through the "RTC" concerning NMED's comments on the Q2/CY2012 quarterly report for the KAFB BFFS. I find that nearly all of the responses are unacceptable.

For the most serious issues dealing with the lack of a decent site conceptual model (issues like cross-sections and appropriate maps that are detailed, consistent, and factually correct), KAFB refused to submit improvements and corrections to the Q2/CY2012 quarterly report. The needed improvements are recurring issues that have not been fixed as a result of earlier NMED comments on other quarterly reports. This is why for the Q2/CY2012 report, we told them to respond in writing to our comments on this specific report instead of fixing the problems in the next quarterly report.

Note that we told them to respond in writing to our comments, not specifically to submit replacement pages for the Q2/CY2012 report. But in order to fully and adequately respond in writing, they would need to submit supplemental text and corrected and improved graphics. For the most serious issues, as mentioned above concerning the site conceptual model, we do not agree with the responses in the RTC and there are no corrected/improved graphics included with the RTC.

KAFB does say in most responses that a 3D model will be presented in the RFI report that doesn't exist yet. As they have no effort to date to improve the geologic, hydrologic, and contaminant models, I wouldn't hold my breath that the models to be presented in the RFI Report will be a marked improvement over what KAFB has previously submitted. The RTC does not specify details as to what KAFB thinks constitutes a "complete", "detailed", and/or "comprehensive" 3-D model to be included in the RFI Report. They don't agree with any of our comments about the conceptual site model, so why would we expect the geologic, hydrologic, and contaminant models in the RFI report to be better?

One other relatively new significant issue is that KAFB is now measuring water levels only every quarter. They are supposed to monitor every month, but according to the RTC, they refuse to switch back to monthly claiming that they indicated such a change in the NMED-approved QUAPP. Apparently, they hid this change in the QUAPP instead of asking to modify the GW investigation work plan where one would normally describe the frequency of collecting water level data (of course, we would not likely have agreed to switch to quarterly water level measurements at this time).

What Tom Cooper wants Tom Blaine to do is approve the RTC, and thus, let KAFB (and Shaw) off the hook for fixing the Q2/CY2013 quarterly report (via an adequate and full response to our comments). The quarterly reports are not simply logs of activity for a specified period as suggested by Tom Blaine's e-mail below. They are supposed to present also the conceptual site models for geology, hydrology, and contamination as the models evolve and are improved as a result of acquiring more characterization data.

--Will



**From:** McDonald, William, NMENV  
**Sent:** Friday, September 13, 2013 12:11 PM  
**To:** Cobrain, Dave, NMENV; Moats, William, NMENV; Brandwein, Sid, NMENV  
**Subject:** RE: NOD Comments 2nd Qt 2012

There are 43 NMED comments that the USACOE responded to. The USACOE concurred ("concur") with 24 of the comments and did not concur ("non-concur") with 19 of the comments. "Non-concur" actually means "will not comply." For two of the "concur" responses ( 16 and 23) and 10 of the "non-concur" responses (1, 8, 13, 15, 18, 19, 21, 24 and 25), the USACOE referenced a non-existent report – the RFI Report – as a response to the commenter's request for information or clarification which, effectively, was no response at all.

**From:** Cobrain, Dave, NMENV  
**Sent:** Wednesday, September 11, 2013 11:19 AM  
**To:** Moats, William, NMENV; McDonald, William, NMENV; Brandwein, Sid, NMENV  
**Subject:** FW: NOD Comments 2nd Qt 2012

Will,

I thought you were out of the office today. See below. I don't have time to read this. Please just let me know if this constitutes continued (recurring) non-responsiveness by Shaw or new non-responsiveness by Shaw. Thanks.

Dave

Main HWB Phone: 505-476-6000  
Direct Office Phone: 505-476-6055  
Fax: 505-476-6030 or 505-476-6060

**From:** Blaine, Tom, NMENV  
**Sent:** Wednesday, September 11, 2013 6:30 AM  
**To:** Kieling, John, NMENV; Cobrain, Dave, NMENV; Reuter, Stephen, NMENV  
**Subject:** FW: NOD Comments 2nd Qt 2012

All –

Can you brief me on the attached? I assume that this is a log of activity in the specified quarter. Do you know what Tom is wanting me to look at?

Tom

**From:** Cooper, Thomas [<mailto:Thomas.Cooper@CBIFederalServices.com>]  
**Sent:** Friday, September 06, 2013 8:54 AM  
**To:** Blaine, Tom, NMENV  
**Cc:** Bitner, Ludie W Jr Civ USAF AFMC 377 MSG/CEIR  
**Subject:** FW: NOD Comments 2nd Qt 2012

Tom

At our last meeting we discussed the 3 outstanding documents that we need to address. I was not sure if you had a copy of the proposed responses to the NOD on a quarterly report. I have attached them here just in case you need a copy.

Thanks and let me know if you have any questions.

Tom



**Tom Cooper, PG, PMP**

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**From:** Britten, Megan

**Sent:** Thursday, September 05, 2013 2:52 PM

**To:** Cooper, Thomas

**Cc:** Hobbs, Rachel G

**Subject:** NOD Comments 2nd Qt 2012



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