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

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Received
AUG - 8 2023
NMED Hazardous Waste Bureau

Ryan J. Wortman
Physical Scientist
Kirtland Installation Support Section
2000 Wyoming Blvd SE
Kirtland AFB NM 87117

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

Dear Mr. Maestas:

Please see attached replacement page for the second page of the *Memorandum For Bulk Fuels Facility Release Project Solid Waste Management Units ST-106/SS-111*. This memorandum was attached to Kirtland AFB's response to the Groundwater Monitoring Work Plan Requirement Letter signed July 27, 2023. A typographical error was identified in the subject line of part 2 of the memorandum. The attached replacement page has been corrected for the record.

Sincerely,

WORTMAN.RYA N.J.1591145289 Digitally signed by WORTMAN.RYAN.J.1591145289 Date: 2023.08.03 09:03:54 -06'00'

RYAN J. WORTMAN, Physical Scientist,
Kirtland Installation Support Section, Air Force Civil Engineer Center (AFCEC)

Attachment:
Replacement Page For Memorandum for Bulk Fuels Facility Release Project Solid Waste Management Units ST-106/SS-111

cc:
NMED Resource Protection Division (Shean), letter and CD
NMED HWB (Maestas, Andress), 2 Hard Copies/2 CDs
NMED-HWB (Cobrain, Wear), letter and CD
NMED GWQB (Romero), letter and CD

KAFB5308

EPA Region 6 (King, McKinney), letter and CD
AFCEC/CZ (Clark, Kottkamp, Segura), electronic only
Public Info Repository, Admin. Record/Info. Repository (AFB/Miranda), Hard Copy/CD
USACE-ABQ District Office (Watts-Gravette, Moayyad, Hernandez), Electronic

2. Regulatory History on Groundwater Monitoring for the Bulk Fuels Facility Release Site

May 2015: On May 14, 2015 (Kirtland AFB, 2015a), the USAF submitted an optimization request letter to NMED outlining recommendations developed at hydrogeology technical working groups. The advisory technical working group included experts from the USAF, NMED, U.S EPA, United States Geologic Survey, University of New Mexico, Albuquerque Bernalillo County Water Utility Authority, City of Albuquerque, and Bernalillo County. Experts collaboratively reviewed the GWM program and made recommendations captured in the May 2015 letter. The optimization recommendations included removing analytes that were non-detect for the site and reducing redundancies in the monitoring reports.

December 2015: On December 16, 2015 (Kirtland AFB, 2015b), the USAF submitted a second phase optimization letter and technical memorandum to NMED. This was a follow-up letter to the May 2015 letter and outlined the advisory hydrogeology technical working group's recommendations to optimize current monitoring and reporting practices to better align with requirements under NMED guidance and industry standards to achieve a more effective monitoring and reporting program.

January 2016: On January 20, 2016 (NMED, 2016), NMED approved the December 2015 optimization letter. The approval reduced sampling frequency and redundant analytical methods. Five analyses were determined by NMED as not being necessary to inform risk, monitor site conditions, or to support future site decisions. These analyses included methods for TPH. According to Resource Conservation and Recovery Act (RCRA) Permit Part 1.38, the approved submittal became enforceable under and controlling over any contrary or conflicting requirements in the Permit, and under Part 1.23.1, all data gathered under approved methods are considered representative.

January 2017: In January 2017 (Kirtland AFB, 2017), the USAF submitted the Work Plan for Bulk Fuels Facility Expansion of the Dissolved-Phase Plume Groundwater Treatment System Design, Revision 2 (Kirtland AFB, 2017) to NMED. This work plan documented recommendations from NMED and the advisory hydrogeology technical working group. These recommendations included the transition to passive sampling technologies for specific GWM wells based on comparison data evaluated by the NMED and the advisory hydrogeology technical working group. This comparison data included data collected by passive and active sampling techniques and is the same data set that NMED included in their November 8th, 2022, disapproval letter.

May 2017: On May 31, 2017 (NMED, 2017), NMED approved the January 2017 work plan. This approval listed GWM wells in which the use of passive sampling methods was appropriate. This NMED-approved work plan is still used to collect most groundwater samples to date and will continue to be followed until this Work Plan is approved. According to RCRA Permit Part 1.38, the approved submittal became enforceable under and controlling over any contrary or conflicting requirements of the Permit, and under Part 1.23.1, all data gathered under approved methods are considered representative.