MICHELLE LUJAN GRISHAM
GOVERNOR

JAMES C. KENNEY
CABINET SECRETARY

Certified Mail - Return Receipt Requested

November 12, 2024

ENTERED

Colonel Michael J. Power, USAF
Base Commander
377 ABW/CC
2000 Wyoming Blvd SE
Kirtland AFB, NM 87117

Ms. Melissa Clark
Civil Engineer Office
377 MSG/CEIE
2050 Wyoming Blvd SE
Kirtland AFB, NM 87117

RE: APPROVAL WITH MODIFICATION
WORK PLAN FOR GROUNDWATER MONITORING, BULK FUELS FACILITY SOLID WASTE MANAGEMENT UNITS ST-106/SS-111
KIRTLAND AIR FORCE BASE, NEW MEXICO
EPA ID# NM6213820974
HWB-KAFB-24-009

Dear Colonel Power and Ms. Clark:

The New Mexico Environment Department (NMED) received the *Work Plan for Groundwater Monitoring, Bulk Fuels Facility Solid Waste Management Units ST-106/SS-111* (Work Plan), with cover letter dated August 26, 2024, on September 3, 2024. NMED has reviewed the Work Plan and hereby issues this Approval with the following modifications:

1. **Section 1, Introduction**

Permittee Statement: "In addition to consolidating the requirements of GWM into one work plan, this Work Plan includes the following updates to the monitoring program:

• Revision of the list of wells sampled in the first quarter, January to March (Q1) and third quarter, July to September (Q3) to better meet the data quality objective of acting as an early warning for potential contaminant migration towards drinking water sources.
• Assignment of wells that have completed at least eight quarters of baseline sampling to appropriate, reduced sampling regimens based on their locations, objectives, and historical analytical results."

NMED Comment: The Work Plan must provide detail on proposed changes and justification for the proposed changes. Include a list of wells that will be sampled in Q1 and Q3 that were not previously sampled in these quarters. Also include information on which wells the Permittee has completed eight quarters of baseline sampling and their new reduced sampling regimens. Revise the Work Plan accordingly.

2. **Section 6, Monitoring and Sampling**

   NMED Comment: The Work Plan contains multiple references to the 2017 Work Plan (*Work Plan for Bulk Fuels Facility Expansion of the Dissolved-Phase Plume Groundwater Treatment System Design; Solid Waste Management Unit ST-106/SS-111, Kirtland Air Force Base, New Mexico, Revision 2*, dated January 23, 2017). The Work Plan must include comprehensive descriptions of all methods used to collect groundwater data and depth to water measurements, along with other standard operating procedures (e.g., sample custody and sample labels), referencing previous work plans is not acceptable. Revise the Work Plan accordingly.

3. **Timing Of Water Level Measurements, Passive and Active Samples**

   NMED Comment: The Permittee must add a statement to the Work Plan that indicates the minimum amount of time to pass between placement of passive sampling devices, water level measurements, and passive and active well sampling in order to allow the water table to equilibrate between each step. The number of passive samplers for each well, and depth/placement of pumps or samplers must also be described. The depth to water measurements must be completed prior to any groundwater sampling. Revise the Work Plan accordingly.

4. **Section 6.2, Groundwater and Light Non-Aqueous Phase Liquid Gauging**
   Permittee Statement: "If a well is found to contain more than 0.01 ft of LNAPL, it will be bailed until no LNAPL is detected or 1 hour has passed. The well will not be sampled during the quarter. The removed LNAPL will be disposed of as hazardous waste at an off-site facility, as discussed in Appendix D."

   NMED Comment: Section 6.4, Light Non-Aqueous Phase Liquid Sampling, states that if sufficient LNAPL is found in any well during routine field activities (i.e., gauging or sampling), it will be sampled to assess the potential degradation over time. The Permittee must revise the Work Plan to clarify when an LNAPL sample will be taken.

5. **Additional Table: Well Information**

   NMED Comment: The Permittee must include a table containing well names, reference elevation interval, date of installation, material, location coordinates, elevation (ground surface), elevations and depths to the top and bottom of screens. Revise the Work Plan accordingly.

6. **Table 2-2, Groundwater Elevation and Light Non-Aqueous Phase Liquid Thickness, Q1 to Q4 2023 and Appendix B-1, Historical Data**

   NMED Comment: Including data from previous monitoring reports is inappropriate for a planning document such as a Work Plan. The Permittee must remove Table 2-2 and Appendix B-1.

   The Permittee must submit addendum pages for the comments discussed above. The addendum pages must be submitted no later than **January 10, 2025**. An updated Plan that contains proposed changes and justification for the proposed changes to the monitoring plan, or a statement that no changes to the Plan are proposed, shall be submitted to NMED on **April 30 of each year** subsequent to the 2024 submittal.

This approval is based on the information presented in the document as it relates to the objectives of the work identified by NMED at the time of review. Approval of this document does not constitute agreement with all information, or every statement presented in the document.

If you have any questions regarding this letter, please contact Naomi Davidson at (505) 690-7567.

Sincerely,

JohnDavid Nance Digitally signed by JohnDavid Nance
Date: 2024.11.12 12:32:16 -07'00'

JohnDavid Nance, Chief
Hazardous Waste Bureau

cc: N. Dhawan, NMED HWB
N. Davidson, NMED HWB
R. Murphy, NMED GWQB
L. King, EPA Region 6 (6LCRRC)
R. Wortman, KAFB
K. Bicknell, ABCWUA
A. Tafoya, VA

File: KAFB 2024 Bulk Fuels Facility Spill and Reading