MICHELLE LUJAN GRISHAM
GOVERNOR

JAMES C. KENNEY
CABINET SECRETARY

Certified Mail - Return Receipt Requested

ENTERED

April 16, 2025

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 MODIFICATIONS
2023 OPERATIONS AND MAINTENANCE PLAN GROUNDWATER TREATMENT SYSTEM
BULK FUELS FACILITY SOLID WASTE MANAGEMENT UNITS ST-106/SS-111, JULY 2023
KIRTLAND AIR FORCE BASE, NEW MEXICO
EPA ID# NM9570024423
HWB-KAFB-23-011

Dear Colonel Power and Ms. Clark:

The New Mexico Environment Department (NMED) received the *2023 Operations And Maintenance Plan Groundwater Treatment System Bulk Fuels Facility Solid Waste Management Units ST-106/SS-111, July 2023* (Plan) with cover letter dated July 26, 2023, on July 31, 2023. NMED has reviewed the Plan and hereby issues this Approval with the following modifications:

MODIFICATIONS

1. **Section 2.12, Extraction Well Operation for Mass Removal Effectiveness**

   Permittee Statement: "Periodic evaluation of mass removal and capture within the IMOA will be performed to maintain the effectiveness of the GWTS. Should groundwater modeling and evaluation indicate that flow rate increases or decreases of pumping flow rates (within a given extraction well) improve the mass removal and/or capture within the IMOA, these operational changes may be performed. Any changes in system operation will be within the approved ranges outlined in the applicable permits (Office of the State Engineer permits) and will be documented. Documentation of these operational changes will be provided in the periodic monitoring report as required by DP-1839."

   NMED Comment: Section 2.1, Groundwater Treatment System Operational Approach, states, "Both NMED agencies (NMED GWQB and NMED HWB) will be notified of any planned long-term adjustments that would result in a change in influent concentration,

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volume to be discharged, or location of discharge. Per DP-1839 Condition No. 34, NMED approval will be obtained prior to implementation of any such changes."

Also, Section 3, Inspection and Preventative Maintenance, states, "In the event that an Operator-initiated system shutdown is needed for routine maintenance, non-routine maintenance, or any other nonemergency reason, the GWTS Project Manager must be contacted, and they will notify the designated Kirtland AFB points of contact. The NMED point(s) of contact is notified for any shutdowns of longer than 24 hours by U.S. Air Force personnel."

The Permittee must obtain concurrence from NMED prior to implementation of extraction well flow rate changes. During these types of changes, increased sampling of nearby groundwater monitoring wells and water level measurements in select areas may be required. Revise the Plan accordingly.

2. **Table 2-3 & Table 5-1**

NMED Comment: Tables 2-3 and 5-1 reference the Technical Memorandum, a document removed from earlier revisions. The Permittee response to Item 10 of the Common Comment and Response Worksheet (Appendix A1, Page A-1-13), states that the information that was meant to be conveyed by the technical memo can now be found within The Sample Analysis Plan (Appendix G) and the Periodic Monitoring Reports for the BFF.

The Permittee must replace the two tables with updated tables that contain proper references to material provided within this Plan or its appendices. Revise the Plan accordingly.

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.

The Permittee must address all comments above and submit a response letter, replacement pages, and an electronic version of the revised Plan no later than **June 30, 2025**.

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

Sincerely,

JohnDavid Nance Digitally signed by JohnDavid Nance
Date: 2025.04.16 16:47:41 -06'00'

JohnDavid Nance, Chief
Hazardous Waste Bureau

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

File: KAFB 2025 Bulk Fuels Facility Spill