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ENTERED

July 2, 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 MODIFICATION
GROUNDWATER SAMPLING METHOD COMPARISON STUDY SUPPLEMENTAL INVESTIGATION WORK PLAN, REVISION 1, BULK FUELS FACILITY SOLID WASTE MANAGEMENT UNITS ST-106/SS-111, MARCH 2025
KIRTLAND AIR FORCE BASE, NEW MEXICO
EPA ID# NM9570024423
HWB-KAFB-24-004

Dear Colonel Power and Ms. Clark:

The New Mexico Environment Department (NMED) received the *Groundwater Sampling Method Comparison Study Supplemental Investigation Work Plan, Bulk Fuels Facility, SWMU ST-106/SS-111, Revision 1, March 2025* (Work Plan), with cover letter dated March 24, 2025, on March 28, 2025. NMED has reviewed the Work Plan and hereby issues this Approval with Modification.

1. **Section 5.4, Groundwater Sample Collection, Pgs. 5-1 and 5-2**

   NMED Comment: Table 5-2 and Section 5.4 describe a procedure wherein the passive samplers (identified as dual-membrane samplers by Figure 5-1) will be hung from the pump of the dedicated low-flow sampling tubing string (at the bottom of the string). Once deployed downhole, the passive samplers will be given the necessary time to equilibrate. Once the time for equilibration has passed, low-flow sampling will be initiated and, upon completion of the low-flow sampling, the tubing string will be removed along with the passive samplers. Samples will then be collected from the passive samplers after their removal.

   Taking low-flow samples while the passive samplers remain in the wellbore may present an issue in comparing the results of low-flow sampling to passive methods, as the conditions under which the passive samplers are subjected to during the investigation will be different from those of normal field deployment of passive samplers.

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The Permittee must submit an addendum to this Work Plan that describes the conditions expected to be present in the wellbore during the low-flow sampling and what potential effects these conditions may have on the passive samplers. This addendum must be specific to the dual-membrane passive samplers used in the comparison investigation and will need to account for the effects of the conditions induced in the wellbore by the low-flow sampling on both membranes. This discussion must be provided for each well included in the study on an individual basis as needed. If the procedure described in this Work Plan will result in significant influence on the passive samplers by the low-flow sampling, the Permittee must include an alternative collection procedure.

2. **Section 5.8, Sample Method Comparison, Pg. 5-4**

   Permittee Statement: "The results from the four wells in this study will be compared to each other to determine if there are consistent qualitative or quantitative differences in the analytical results obtained from each method at this site. This analysis will be included in the relevant Periodic Monitoring Report for the quarter following the eighth quarter of sample collection for the comparison study and may be used to inform future annual updates to the Work Plan for Groundwater Monitoring (Kirtland AFB, 2024a)."

   NMED Comment: Inclusion of the results and analysis of the comparison study in a periodic monitoring report is inappropriate. The Permittee must provide the results and analysis of the comparison study as a separate, stand-alone report. Revise the Work Plan accordingly.

3. **Figure 5-1, Sampling Assembly**

   NMED Comment: Figure 5-1 identifies the passive samplers used in this study as "DMS". Based on the context of the Work Plan, this acronym is assumed to identify the passive samplers as dual-membrane passive samplers. All acronyms must be defined before being used in the Work Plan, and the type of passive sampler used needs to be clearly stated. The Permittee must submit an addendum to this Work Plan that identifies the type of passive sampler to be used. This addendum must include technical specifications along with any pertinent operating information.

Approval of this Work Plan is contingent upon the submittal and review of the addendums as required by Comments 1 and 3. These addendums must be submitted no later than **August 29, 2025**.

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 Sam Bollinger at (505) 490-5808.

Sincerely,

JohnDavid Nance Digitally signed by JohnDavid Nance
Date: 2025.07.02 08:03:09 -06'00'

JohnDavid Nance, Chief
Hazardous Waste Bureau

cc: N. Dhawan, NMED HWB
N. Davidson, NMED HWB
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File: KAFB 2025 Bulk Fuels Facility Spill