



NEW MEXICO
ENVIRONMENT DEPARTMENT



Hazardous Waste Bureau

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 11, 2010

Colonel Robert L. Maness
Base Commander
377 ABW/CC
2000 Wyoming Blvd. SE
Kirtland AFB, NM 87117-5606

Mr. John Pike
Director, Environmental Management Section
377 MSG/CEANR
2050 Wyoming Blvd., Suite 116
Kirtland AFB, NM 87117-5270

**RE: LETTER OF MAY 3, 2010, REGARDING MARCH 16, 2010, STAGE 2
ABATEMENT PLAN ADDENDUM: SOLID WASTE MANAGEMENT
UNITS ST-106 AND SS-111, BULK FUELS FACILITY SPILL
KIRTLAND AIR FORCE BASE
EPA ID# NM9570024423, HWB-KAFB-10-004**

Dear Colonel Maness and Mr. Pike:

The New Mexico Environment Department (NMED) has received Colonel Maness' letter of May 3, 2010, requesting approval to deviate from modifications made by the NMED to the subject plan. One of main objectives of the plan is to install three wells to be included in the groundwater monitoring system for the Bulk Fuels Facility Spill (Solid Waste Management Units ST-106 and SS-111). The modifications to the plan were required by the NMED in its letter to Kirtland Air Force Base (Permittee) of April 2, 2010. The deviations requested by the Permittee include increasing well screen lengths, changing the location of one well (KAFB-10626), and extending the timeline to construct cluster wells at each of the three well locations. Each of these requests is addressed below.

Well Screen Lengths

NMED approves the request to install wells screens that are 25 feet in length, provided that no more than 15 feet of screen length for each well is located below the water table. This approval applies to all three wells as was previously stated in my e-mail to Mr. John Pike and Mr. Thomas Berardinelli of April 22, 2010.

Location of Well KAFB-10626

The May 3, 2010, letter indicates that well KAFB-10626 was installed near the intersection of Anderson and Georgia as proposed in the modified plan, but not at the coordinates that were selected by the NMED. The letter further indicated that NMED's letter of April 2, 2010, contained conflicting instructions because the coordinates selected by the NMED did not match those of the proposed plan.

The Permittee failed to notify the NMED of the conflicting instructions and installed the well without seeking resolution of where the well was to be located. Well KAFB-10626 may be located too far away to properly define the leading edge of groundwater contamination. Although the NMED will not require a replacement well for KAFB-10626 at this time, if it is necessary to properly define the extent of groundwater contamination, NMED may require at a later time the installation of groundwater-monitoring wells at the coordinates specified in the NMED's letter of April 2, 2010. NMED reminds the Permittee that all work under the subsequent to the April 2, 2010 letter must be approved in advance by NMED.

Extending Timeline to Construct Cluster Wells

The two additional groundwater monitoring wells to be installed at each cluster well site are considered by the NMED as part of the work to be done under the Groundwater Investigation Plan (that is due July 7, 2010). As such, the additional wells are to be installed in accordance with the schedule to be included in the Groundwater Investigation Plan.

If you have any questions, you may contact William McDonald or Sid Brandwein of my staff at (505) 222-9582 and (505) 222-9504, respectively.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

cc: J. Kieling, NMED HWB
W. Moats, NMED HWB
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