Dear Mr. Blaine,

During the past month, a number of technical working groups incorporating a variety of stakeholders, including NMED, worked to determine the most successful path forward to remediate the Kirtland Air Force Base Bulk Fuels Facility (BFF) Sites SS-111/ST-106. These working groups outlined several actions for the vadose zone, light non-aqueous phase liquid (LNAPL), and dissolved ethylene dibromide (EDB) plume. A positive outcome is the “Groundwater Extraction Pilot Implementation and Additional Characterization Work Plan”, we sent you on 01 August 2014 and NMED subsequently approved on 20 August 2014. This interim measure (IM) work plan (WP) outlines the steps towards extracting and treating EDB contaminated groundwater and includes the installation of additional monitoring well clusters to further characterize the vertical and horizontal extent of the EDB plume. Additionally, a soil vapor extraction (SVE) working group is discussing installation of new SVE well clusters and expansion of the SVE system, along with designing an aerobic treatability study to treat the LNAPL portion of the plume. These collaborative technical working groups have led to efficient and effective progress in identifying data gaps and developing IMs.

Currently, NMED is reviewing the RCRA Facility Investigation (RFI) Vadose and Groundwater Zone reports submitted in March 2014. The Air Force wants to ensure the finest quality RFI reports are under review and include the most current data. NMED and the Air Force have identified additional analysis requirements, clerical errors, and data gaps that were addressed by the 01 August 2014 WP. Correcting and including this data gap information will provide improved RFI reporting.

In light of these events, the Air Force requests a retraction of the RFI reports until this new data can be collected and incorporated. We will address the data gaps when we resubmit the RFI and expect it will be best postured to meet or exceed RCRA standards. Kirtland and the AF remain committed to an effective and timely clean-up and appreciate your support and collaboration.
Please contact Mr. L. Wayne Bitner at (505) 853-3484 or at ludie.bitner@us.af.mil, Ms. Victoria R. Branson at (505) 846-6362 or at victoria.branson@us.af.mil, and/or Dr. Adria Bodour at (210) 395-8426 or at adria.bodour.1@us.af.mil if you have questions.

Sincerely,

TOM D. MILLER, Colonel, USAF
Commander

cc:
NMED-HWB (Kieling, Cobrain, McDonald, Brandwein)
NMED (McQuillan, Longmire)
NMED-PSTB (Reuter)
NMED-GWQB (Schoeppner)
NMED-OGC (Kendall)
EPA Region 6 (King)
AFCEC-CZRX (Oyelowo, Bodour)
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