NEW MEXICO
ENVIRONMENT DEPARTMENT

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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

September 29, 2015

Colonel Eric H. Froehlich
Base Commander
377 ABW/CC
2000 Wyoming Blvd.SE
Kirtland AFB, NM 87117-5606

John Pike
Director, Environmental Management Services
377 MSG
2050 Wyoming Blvd. SE, Suite 116
Kirtland AFB, NM 87117-5270

Re: RAPID RESPONSE ACTION TO NOTICE OF VIOLATION GROUNDWATER DISPOSITION WORK PLAN, BULK FUELS FACILITY SPILL SOLID WASTE MANAGEMENT UNITS ST-106 AND SS-111 KIRTLAND AIR FORCE BASE EPA ID#NM9570024423, HWB-KAFB-13-MISC

Dear Colonel Froehlich and Mr. Pike:

The New Mexico Environment Department (NMED) is in receipt of the Kirtland Air Force Base (AFB) (the Permittee) *Rapid Response Action to Notice of Violation Groundwater Disposition Work Plan*, dated September 18, 2015. The Rapid Response Action Work Plan for water disposition proposes:

- Percolation testing at two locations in the Tijeras Arroyo located on Kirtland AFB to assess whether or not the alluvial sediments provide sufficient drainage for the use of infiltration galleries.
- Percolation testing at two depths at each location, surface and subsurface, to look at surface verses subsurface infiltration rates.
- Shutdown of the pump in well KAFB-7 for 24-hours with monitoring of water levels within KAFB-7 and surrounding observation wells.
- Pumping of KAFB-7 at 750 to 800 gallons per minute for 24-hours, followed by a recovery period of a maximum of 3 days or until data indicates equilibrium has been achieved.
- Completion of a downhole camera and caliper survey of KAFB-7 to evaluate the condition of the well.

The Permittee's Rapid Response Action Work Plan for disposition of water is hereby approved with the following conditions:

1. The Permittee shall revise and resubmit Figure 1 to clarify that the groundwater treatment system shown is a "full-scale" treatment system and not a "permanent" groundwater treatment system. The current pump and treat action is an interim measure and not a final remedy; a final, permanent treatment system requires evaluation as part of the Corrective Measures Evaluation process.
2. The Permittee shall conduct any percolation testing on or near Tijeras Arroyo on Kirtland AFB property using the methodology described in the Permittee's January 26, 2015 Percolation Testing Work Plan, as approved by the NMED's letter dated February 10, 2015.
3. The Permittee may modify depths of boreholes and percolation tests depending on the observed lithology, specifically the occurrence of caliche.
4. The Permittee shall collect a minimum of one geotechnical sample from the anticipated depth of infiltration. Samples should be collected and analyzed using the methods and procedures referenced in the NMED approved January 26, 2015 Percolation Testing Work Plan.
5. Boreholes should be abandoned upon completion of testing, in accordance with the Office of the State Engineer and KAFB requirements.
6. The Permittee shall submit decontamination procedures that will be used to clean any equipment that is placed/installed downhole at well KAFB-7 and monitoring wells.
7. The Permittee shall submit a Temporary Permission request letter to the NMED Ground Water Quality Bureau (GWQB) for continued discharge to the Tijeras Golf Course located on Kirtland AFB. This Temporary Permission for discharge will allow for discharge at the golf course for an additional 120 days.
8. The Permittee shall submit a Temporary Permission request letter to the NMED GWQB for the discharge of treated groundwater through injection in water well KAFB-7 located on Kirtland AFB. This Temporary Permission letter will undergo public notice and requires NMED GWQB approval prior to starting injection.
9. Prior to construction of any infiltration galleries or direct discharge to the Tijeras Arroyo, the Permittee shall submit an addendum to the Rapid Response Action Work Plan, subject to NMED approval, that provides percolation test results as well as siting, design, and construction information for the infiltration galleries and piping.

Should you have any questions, please contact Mr. Dennis McQuillan at 505-827-2140 or dennis.mcquillan@state.nm.us.

Sincerely,

Kathryn Roberts
Director
Resource Protection Division

KR/DM

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