

DEPARTMENT OF THE AIR FORCE 377TH AIR BASE WING (AFGSC)

6 May 2021

Colonel David S. Miller, USAF Commander 377th Air Base Wing 2000 Wyoming Blvd SE Kirtland AFB NM 87117

Mr. Kevin M. Pierard Hazardous Waste Bureau (HWB) Chief New Mexico Environment Department (NMED) 2905 Rodeo Park Drive East Building 1 Santa Fe NM 87505-6303

Dear Mr. Pierard

Kirtland Air Force Base (AFB) respectfully requests an extension for the submittal of the Bulk Fuels Facility Solid Waste Management Units (SWMUs) ST-106/SS-111 Quarterly Monitoring Reports. Currently the quarterly monitoring reports are submitted to the New Mexico Environmental Department Hazardous Waste Bureau (NMED-HWB) 90 days after the end of the quarter, in accordance with the Bulk Fuels Facility Expansion of the Dissolved-Phase Plume Groundwater Treatment System Design, Revision 2 SWMUs St-106/SS-111 Kirtland Air Force Base, New Mexico, which was conditionally approved by NMED-HWB on May 31st 2017. The current reporting schedule does not allow sufficient time for a thorough review by the Air Force and for the contractor to make any necessary revisions. We believe this additional time will result in improved document quality.

The Air Force respectfully requests a 45-day extension on the first quarter (Q1) and third quarter (Q3) Monitoring Reports and a 60-day extension on the second quarter (Q2) and fourth quarter (Q4) Monitoring Reports. These extensions would allow the Air Force sufficient time to produce a document with a higher level of quality and ensure that NMED-HWB's concerns expressed in the July 11, 2020 letter, RE: Quarterly Monitoring Report For April-June 2019 Bulk Fuels Facility SWMUs St-106/SS-111 Kirtland Air Force Base, New Mexico, are routinely incorporated into future monitoring reports. In addition, the Air Force is experiencing staff turnover with our legal reviewer and losing the highly qualified expert position. The new legal staff will require additional time for reviews as they become more familiar with the project and the loss of the highly qualified expert will require additional time for all reviewers to ensure the highest level of report quality.

The Q2 and Q4 monitoring reports contain a larger data set because soil vapor and certain groundwater wells are sampled semi-annual. The reports also include a modeling component of groundwater plumes and the Q4 report contains an annual update that evaluates data collected during the previous four quarters. The 60-day extension will allow sufficient time to include these additional elements within the Q2 and Q4 monitoring report.

Upon NMED-HWB approval of the proposed extension, the Q1 and Q3 Monitoring Reports would be submitted no later than August 14th and February 14th, respectively. The Q2 and Q4 Monitoring Reports would be submitted no later than November 30th and May 31st, respectively. Kirtland AFB appreciates

your department's consideration of this extension request. If you have any questions regarding this request, please contact Mr. Sheen Kottkamp at (806)463-0811 or email sheen.kottkamp.l@us.af.mil.

Sincerely

DAVID S. MILLER, Colonel, USAF Commander

cc:

NMED Resource Protection Division (Stringer), electronic only
NMED HWB (Pierard, Andress), two letters and CDs
NMED GWQB (Hunter), letter and CD
EPA Region 6 (King, Ellinger), letter and CD
SAF-IEE (Lynnes), electronic only
AFCEC/CZ (Clark, Kottkamp, Segura, Wortman), electronic only
USACE-ABQ District Office (Moayyad, Phaneuf, Dreeland, Kunkel, Lovato), electronic only
Public Info Repository, Administrative Record/Information Repository (AR/IR) and File