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Jennifer J. Pruett
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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 11, 2020

Colonel David S. Miller
Base Commander
377 ABW/CC
2000 Wyoming Blvd SE
Kirtland AFB, NM 87117

Lt. Colonel Wayne J. Acosta
Civil Engineer Office
377 Civil engineer Division
2050 Wyoming Blvd SE, Suite 116
Kirtland AFB, NM 87117

**RE: QUARTERLY MONITORING REPORT FOR APRIL-JUNE 2019
BULK FUELS FACILITY SOLID WASTE MANAGEMENT UNITS ST-106/SS-111
KIRTLAND AIR FORCE BASE, NEW MEXICO
EPA ID# NM6213820974
HWB-KAFB-19-017**

Dear Colonel Miller and Lt. Colonel Acosta:

The New Mexico Environment Department (NMED) is in receipt of the Kirtland Air Force Base (Permittee) *Quarterly Monitoring Report for April-June 2019, Bulk Fuels Facility, Solid Waste Management Unit ST-106/SS-11* (Report), dated September 2019 and received September 27, 2019.

No revision to the Report is required. NMED's attached comments are intended to provide direction to the Permittee in the preparation of future quarterly monitoring reports. Necessary changes based upon NMED's comments should be incorporated into future reports. The Permittee must ensure that future monitoring reports fully comply with Kirtland Air Force Base (KAFB) Hazardous Waste Facility Permit (Permit) Section 6.1.6. Quarterly Progress Reports, Section 6.2.4.1. Quarterly Reporting, and Section 6.2.4.4. Periodic Monitoring Reports. Additional guidance on preparing groundwater monitoring reports can be found in NMED's *General Reporting Requirements for Routine Groundwater Monitoring at RCRA Sites*.

Should you have any questions please Rob Murphy of my staff at robert.murphy@state.nm.us
or (505) 476-6022.

Sincerely,

**Kevin
Pierard**

Digitally signed
by Kevin Pierard
Date: 2020.07.11
08:25:15 -06'00'

Kevin M. Pierard, Chief
Hazardous Waste Bureau

Attachments I

cc: D. Cobrain, NMED HWB
B. Wear, NMED HWB
L. Andress, NMED HWB
R. Murphy, NMED HWB
L. King EPA Region 6 (GLCRRC)
S. Clark, KAFB
K. Lynnes, KAFB

File: KAFB 2020 Bulk Fuels Facility Spill and Reading

Attachment

GENERAL COMMENTS:

1. Monitoring Report Contents

NMED Comment:

Based on issues identified in this Report and other periodic reports, NMED is providing the following reporting requirements which the Permittee must incorporate into future reports. Permittee is required to include the following as applicable:

- a. The response to NMED's comments must be included as Appendix A of each document revision.
- b. All field methods for the project must be documented in an appendix, as required by Permit Section 6.2.4.4.11. The documentation must be specific to each monitoring activity, such as soil vapor monitoring, groundwater monitoring, or operation and maintenance of the groundwater treatment system. References to quality assurance project plans (QAPPs), standard operating procedures (SOPs), or work plans are not acceptable. All deviations from approved work plans must be discussed and explained in a Deviations section.
- c. Wells must be consistently referred to by the same name/designation in all periodic reports, sections of the text, tables, and figures. The designations must match those provided in the digital analytical data files.
- d. Sampling data tables must include the practical quantitation limit (PQL) and listed laboratory report detection limit (RDL) for each analysis.
- e. Sampling data tables must include the appropriate screening levels for data comparison.
- f. Analytical data tables in digital format must include a column that indicates which analytical data report the specific sample information can be found. This link must correspond to the analytical data report file name.
- g. Data quality exceptions, such as when the PQL exceeds the corresponding screening level, must be identified as such in all tables and figures (see Permit Section 6.5.18).
- h. Analytical data provided in digital format such as Microsoft Excel or Access files must be provided in a sortable, searchable format. Previous reports have provided digital data in the same format as the printed tables. These tables are not sortable or searchable. Provide the tables in a standard database format.
- i. Analytical data packages must be submitted in accordance with KAFB Permit Section 6.5.18.2, Laboratory Deliverables.
- j. All tables, figures, and appendices must be appropriately numbered and titled.
- k. Every page of every submittal, including all pages within all sections and appendices, must be numbered either sequentially or in some other format acceptable to NMED.

2. Analytical Data Detection and Quantitation Limits

NMED Comment: Many of the analytical data tables presented in the Report list the limit of detection (LOD) for each sample analysis; however, it is not clear if this value represents the laboratory method detection limit or reporting detection limit. Some tables list the LOD and some the limit of quantification (LOQ). The permittee must provide the method detection limit (MDL) in the data tables. In addition, the Permittee must include the reporting detection limit (assuming this is the Permittee's "LOD") and the PQL (assuming this is the Permittee's "LOQ") for each sample analyzed in the data tables.

The Permittee's Quality Assurance Project Plans (QAPPs) indicate that the Permittee is using three different variations of terminology for method reporting limits, including one which seems to be backwards. The Permittee's QAPP for Vadose Zone Treatability Studies Attachment 1, Tables 1-1a, Method Reporting Limits – Drinking Water, 1-1b, Method Report Limits – Soil and Investigation Derived Waste, and 1-1c, Method Reporting Limits – Volatile Organic Compounds in Air, all seemingly use LOQ appropriately (as the PQL), but there is a lack of consistency between the method detection limit and reporting detection limit.

In Table 1-1a, Drinking Water, "MDL" appears to equate to the method detection limit, and "LOD" appears to equate to the reporting detection limit. In Table 1-1b, Soil, "LOD" appears to equate to the method detection limit and "DL" appears to equate to the reporting detection limit. In Table 1-1c, Air, "DL" appears to equate to the method detection limit and "LOD" appears to equate to the reporting detection limit. Based on the fact that the PQL must be greater than the reporting detection limit and the reporting detection limit must be greater than the method detection limit, Table 1-1b, Soil, appears to be wrong. NMED is assuming that similar tables appear in the QAPP for quarterly monitoring.

These issues cause confusion for the reviewer, community stakeholders, and the public, and increases the time required to review submittals from the Permittee. The Permittee must use appropriate and consistent terms for Quality Assurance /Quality Control in all periodic reporting submittals and for all media (e.g., use MDL consistently instead of DL). While NMED does not review or approve QAPPs, the Permittee must assure that they are providing their contractors with the appropriate information to provide appropriate, consistent, and accurate information to NMED. Consistency in reporting by the Permittee will reduce both agency and Air Force internal review times.

SPECIFIC COMMENTS:

3. Table of Contents, Appendix B, page iv:

NMED Comment: Appendix B, New Activities Supporting Information, contains well completion reports for four new wells installed and developed in accordance with the NMED-approved 2017 *Work Plan for Vadose Zone Coring, Vapor Monitoring, and Water Supply Sampling*. KAFB Permit Section 6.2.2.1.2, Site Investigations-Investigation Reports,

and Section 6.2.4.3, Reporting Requirements-Investigation Reports, require that the information and data collected from all investigation activities conducted during the quarter be submitted to NMED as separate, stand-alone reports. The Permittee must submit individual reports for all investigation activities conducted in support of the ongoing investigation of the bulk fuels facility spill, rather than submit the information as appendices in quarterly reports.

4. Section 2.5 Q2 2019 Soil Vapor Data, page 2-4:

Permittee Statement: “The RCRA permit does not specify cleanup levels for soil vapor. The quarterly reports are not intended to assess risk; the vapor data are used to assess concentration trends. The risk assessment (USACE,2017e) compares vapor concentrations to the vapor intrusion screening levels in the NMED Risk Assessment Guidance for Site Investigations and Remediation. All EDB and benzene concentrations are compared against 3,800 and 3,200 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), respectively. HC concentrations are compared against 1,000 parts per million by volume (ppmv). The comparison concentrations used in this report were determined by historical maximum and minimum soil vapor results to show which SVMs had relatively high or low concentrations.”

NMED Comment: The Permittee must clarify if the comparison values for EDB, benzene, and HC represent the historical maximum or minimum, or some other calculated value so that changes relative to the values can be evaluated. The Permittee must also provide a reference for the historical soil vapor values. The Permittee accurately states that quarterly reports are not intended to assess risk; however, the Permittee must provide a comparison of detected concentrations to a regulatory standard for the purpose of assessing the presence and location of contaminants of concern. NMED’s *Risk Assessment Guidance for Site Investigations and Remediation* (2019 and as updated) vapor intrusion screening levels (VISLs) must be used as a first-tier screening assessment.

5. Section 2.2 Bioventing Pilot Test, page 2-2:

Permittee Statement: “A bioventing report will be submitted on January 31, 2020 as requested by NMED in a letter dated February 25, 2019 (NMED, 2019). This report will include data collected up to Q4 2019. Data collected after Q4 2019 will be provided in the relevant quarterly monitoring reports. The Q4 2020 Quarterly and Annual Monitoring Report will include results to date, and the final results of the bioventing pilot test will be provided in the Q4 2021 Quarterly and Annual Monitoring Report.”

NMED Comment: Bioventing pilot test data is collected each quarter; therefore, the Permittee must provide quarterly data updates in separate quarterly status reports specific to the bioventing pilot study to allow NMED to provide timely adjustment and inputs to the bioventing system. The final results of the bioventing pilot test must be submitted as a stand-alone document rather than as an appendix to the Q4 2021 Quarterly and Annual

Monitoring Report.

6. Section 3.3.1 Sampling Deviations, page 3-3:

Permittee Statement: “Groundwater samples were not obtained from seven wells in Q2 2019. Three wells (KAFB-106001, KAFB-106008, and KABF-106079) could not be sampled due to suspected biofouling. These wells will be sampled using passive sampling techniques in the future after well rehabilitation is evaluated.”

NMED Comment: The Permittee must provide additional information in a subsequent quarterly report on suspected biofouling of wells KAFB-106001, KAFB-106008, and KABF-106079, such as evidence for biofouling, the source of biofouling, and the date when biofouling was first suspected. Well KABF-106079 is less than 1000ft from interim measure extraction well KAFB-106239. Provide information on the potential for suspected biofouling at KAFB-106079 to impact KAFB-106239 and the Groundwater Treatment System. The Permittee must also submit a work plan for evaluating and conducting rehabilitation of the three wells. Use of passive sampling techniques for wells KAFB-106001 and KABF-106079 is contingent upon NMED approval. Because LNAPL was previously detected in well KAFB-106008, use of passive sampling is not appropriate.

7. Section 3.6.1.1 EDB Analytical Results, page 3-5:

Permittee Statement: *Five EDB exceedances were from wells north of Ridgecrest Drive SE but none were north of Gibson Boulevard SE.*

NMED Comment: Figures 3-5 and 3-6 present EDB concentrations in groundwater for reference elevation 4857 and 4838, respectively. Both figures depict the northern extent of the EDB plume as being north of Gibson Boulevard SE. The Permittee must revise the statement and figures for accuracy if they are included in future periodic reports.