# Kirtland Air Force Base Fuel Leak Cleanup

#### Presenters: Dennis McQuillan, NMED Kathryn Lynnes, Air Force



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# **Project History and Cleanup Strategy**



#### Dennis McQuillan New Mexico Environment Department (NMED) Chief Scientist

# **A Partnership for Success**

A collaborative technical team is solving the complex hydrogeologic and engineering challenges posed by the fuel leak with support from Albuquerque's neighborhood groups



# **Site History**

- **1951-53** Kirtland Air Force Base (KAFB) Bulk Fuel Facility (BFF) constructed
- **1953-75** Handling of aviation gasoline which contained the additive ethylene dibromide (EDB)
- **1999** KAFB discovered and notified NMED of leak, ceased using underground pipelines, and initiated site investigations pursuant to Water Quality Control Commission (WQCC) regulations
- 2001 KAFB notified NMED of detected fuel constituents in groundwater
- **2003-15** Soil vapor extraction (SVE) remediation conducted
- **2007** Light non-aqueous phase liquid (LNAPL) discovered on groundwater table
- 2008-11 Bioslurping conducted to remove LNAPL
- **2009** Water table began to rise
- **2010** Project transferred from WQCC to Resource Conservation and Recovery Act (RCRA) authority
- **2014-present** Interagency partnership, additional interim measures
- **2015** Groundwater cleanup begins
- 2016 Cone of depression observed around toe of EDB plume



# **Current Regulatory Basis**

NMED has been granted primacy by the U.S. Environmental Protection Agency to administer:

- The Safe Drinking Water Act (SDWA) program, including WQCC Underground Injection Control (UIC) and
- The RCRA program.

Public water systems, the Albuquerque Bernalillo County Water Utility Authority (Water Authority), KAFB, and the VA Hospital, must deliver water to consumers that meets SDWA standards.

Cleanup of the BFF site must comply with and continues to meet the corrective action provisions in KAFB's RCRA permit.

### **RCRA Corrective Action Process**

RCRA Facility Investigation (RFI) collects data to support corrective action decisions

- Site investigations are done to define the nature and extent of contamination
- Site investigations are performed in datadriven phases
- Interim measures can be implemented during RFI process
- The RFI report is approved by NMED

# **Conceptual Site Model Animation**

https://www.env.nm.gov/NMED/Issues/KirtlandFuelPlume/KAFBProjectImages.html





# Cleanup Strategy

Implement multiple technologies, both simultaneously and sequentially, based on plume anatomy

<u>Conceptual Site Model</u> – before interim measures



#### Current Conditions -

- 12 years of SVE significantly reduced contamination in the vadose zone
- ~4 years of bioslurping significantly reduced residual LNAPL

# **2016 Strategic Plan**

NMED Final 2016 Strategic Plan is available online: <a href="http://www.nmenv.state.nm.us">http://www.nmenv.state.nm.us</a>

Goal: Protect Albuquerque's aquifer and drinking water supply wells in the area of the fuel leak

Strategies to Achieve the Goal:

- 1. Implement a robust site monitoring & wellhead protection program
- 2. Characterize and remediate LNAPL, impacted soil, and associated dissolved phases in the source area
- 3. Collapse the dissolved EDB plume
- 4. Meet or exceed all requirements for providing public comment, information and involvement

# **2016 Strategic Plan**

# <u>Strategy #1</u> Implement a robust site monitoring & wellhead protection program

- Quarterly testing of monitoring wells shows a relatively stable contamination plume
- Quarterly testing of sentinel wells shows no detections of any fuel constituents
- Monthly testing of drinking water supply wells shows no detections of any fuel constituents

# **Site Monitoring and Wellhead Protection**



# **Drilling Activities**



### **2016 Strategic Plan**

# **<u>Strategy #2</u>** Characterize and remediate LNAPL, impacted soil, and associated dissolved phases in the source area

- Rebound and respiration monitoring provides valuable data on how soil bacteria are biodegrading fuel contamination
- SVE transitioning to bioventing
- Additional core drilling into LNAPL zone planned
- In situ bioremediation pilot tests planned

# **2016 Strategic Plan**

#### **Strategy #3** Collapse the dissolved EDB plume

- Groundwater pump-and-treat began in 2015
- 141 million gallons of groundwater has been treated, with ~45 grams of EDB removed from the aquifer
- Treated groundwater contains no detectable fuel contaminants
- The cone of depression that has formed around the toe of the EDB plume is a major milestone towards containing and collapsing the EDB plume
- No evidence yet of EDB plume shrinkage



# **Groundwater Cleanup**



# **A Persistent Cone of Depression**



• Persistence of cone of depression  $\rightarrow$  robust system design

KAFB Base Boundary

# **GWTS Expansion**



# **2016 Strategic Plan**

<u>Strategy #4</u> Meet or exceed all requirements for providing public comment, information and involvement

 Routine public meetings, upon request presentations, field trips, "deep dive" technical seminars, public workshops



### **Air Force Perspective**



#### Kate Lynnes Air Force Senior Advisor

# Air Force & NMED Commitment

- Cleaning up the BFF site is one of the top priorities of the Air Force and NMED
- Initiating groundwater cleanup in June 2015 was a huge milestone in this project
- Working collaboratively with the Air Force, NMED, Water Authority, City of Albuquerque, and EPA Region 6 has been critical to our success
- Air Force and NMED will not allow fuel contamination to impact any drinking water wells

# **New Air Force Project Team**

- Air Force Civil Engineer Center (AFCEC) assumed technical and programmatic lead, and brought wide-breadth of subject matter experts
- KAFB 377th Air Base Wing continued involvement and support of RCRA Permit requirements
- U.S. Army Corps of Engineers assigned a dedicated Project Manager for contract oversight
- Secretary of the Air Force brought in a Senior Advisor

# **Three Key Components to Success**



# **Regulatory Component**

The BFF cleanup is a regulatory torte with many layers:

- Corrective Action requirements in RCRA permit
  → Hazardous Waste Bureau
- Air quality, noise permits, and right-of-entry license agreements → City of Albuquerque
- Class V UIC for the injection of treated groundwater → Ground Water Quality Bureau
- Point of Diversion permits and prohibition on groundwater use over plume → Office of the State Engineer

# **RCRA Corrective Measures Evaluation**

- NMED will direct the Air Force to perform a Corrective Measures Evaluation (CME) once the RFI Report and risk assessment have been approved
- CME will evaluate potential remedial alternatives against threshold and evaluation criteria defined in the KAFB RCRA permit
- As part of the CME Report, the Air Force will recommend a remedy or remedies to NMED
- NMED's selection of a final remedy(ies) will include a robust public participation process as required by RCRA
- After the public hearing, NMED will select a final remedy or remedies and will issue a written response to public comments

### **Risk Assessment**

- Data collected during the RFI must be evaluated to determine if the contaminants released poses a threat to human health or the environment
- This evaluation process uses both screening levels and cleanup criteria established by the NMED in their *Risk Assessment Guidance for Site Investigations and Remediation* (July 2015)

### **Exposure Pathways**

#### Potential risk occurs when a human or ecological receptor is exposed to contamination.





Human or Ecological Receptor

No exposure pathways or risks from BFF fuel contamination are present

Potential Exposure Pathway	Risk Level	Explanation
Drinking Water		Drinking water provided by the Albuquerque Bernalillo County Water Utility Authority (ABCWUA) continues to be free of any detectable fuel contamination and is safe for all uses. Public drinking water wells near the groundwater contamination <u>plume are tested monthly, and</u> <u>show no detections of any fuel compounds</u> . Sentinel wells, which are monitoring wells located between the drinking water wells and the contamination plume, are tested quarterly and show no detections.
Surface Soil		Surface soil contamination never migrated off of Kirtland. Surface soil contamination has only occurred at the Kirtland Air Force Base Bulk Fuels Facility (BFF) industrial area which is not accessible to the general public. <u>Contaminated soil has been</u> <u>excavated and removed for off-site disposal</u> .
Surface Water		There is no pathway for contaminants to enter surface water.
Vapor Intrusion		Homes and businesses are not at risk for vapor contamination. There is no off-Base surface or near-surface soil contamination, and groundwater contaminants are too deep, to allow vapors to enter homes and buildings.
Garden Vegetables		<b>There is no risk of contamination to garden vegetables.</b> ABCWUA water is safe for irrigation. <u>There is no off-Base surface soil contamination, and vapors</u> <u>from groundwater are too deep, for fuel to contaminate garden vegetables</u> .
Recreational Activities		There is no risk of contamination to people enjoying recreational activities in Bullhead Park or in the Dog Park. Reclaimed ABCWUA water is used to irrigate the parks. There is <u>no off-Base surface soil</u> <u>contamination</u> , and vapors from groundwater are too deep, to pose a risk to people in the park areas.
(June 2016)		Safe Use Caution 🔯 Unsafe 27

# **WQCC Class V UIC Discharge Permit**

- KAFB golf course reduces irrigation in winter months; therefore another discharge option is needed
- Gravity-fed injection of clean water is green and sustainable technology
- Permit proposes gravity-fed injection wells into the regional aquifer including KAFB-7
- Permit posted for Public Comment Nov 9, 2016; comments due Feb 11, 2017
- Currently, operating under a temporary permission to gravity-fed KAFB-7 treated effluent from GWTS

# **Technical Component**

BFF uses a data-driven, collaborative technical approach that includes:

- Complex Site Initiative (CSI)
- Technical working groups
- Innovative pilot tests
- Cost consciousness

# **Air Force Complex Site Initiative**



### **Technical Considerations of Treated Water**





# **KAFB-7 UIC Pilot Test**

- Pilot test gravity-fed injection from Feb 20 - Jun 21, 2016
- No contaminants in treated effluent
- Initial vs. steady-state operations during injection
  - KAFB-7 groundwater rose
    - 2-14 feet vs 3-6 feet
- Minimal aquifer response to observation wells surrounding KAFB-7
- Injection is a viable, beneficial use of treated water

# Particle tracking with an injection rate of 800 gallons per minute



Arrows = 1 year intervals

#### Reducing Project Cost to Taxpayers Without Compromising Public Health & Safety

- Multiple monitoring wells in a single borehole
  - Maximizing well installation produces better data, is significantly less expensive, less disruptive to the neighborhood, and safer for workers

#### • Optimization of groundwater and vadose zone monitoring

 With 4 years of robust monitoring data, it is no longer necessary to test every well for every chemical analyte on a quarterly basis

#### Passive diffusion bag (PDB) sampler validation study

 If validated, PDB sampling will be significantly less expensive, safer for workers, and produce less waste

#### Elimination of duplicative permitting

 NMED determined that requiring both a RCRA Hazardous Waste Permit and a WQCC Groundwater Discharge Permit for the same land application of treated groundwater was inefficient

# **Political Component**

- Commitment to improving inter-governmental communication and coordination
- Regular updates to the Federal Congressional Delegation, City and County elected officials and staff, the Radioactive and Hazardous Materials Committee, and the Water Authority Board
- Regular stakeholder meetings
- Technical working groups that include Water Authority, City of Albuquerque, and EPA Region 6

# **Historical Community Involvement**

- Public had tremendous mistrust and no confidence the problem was being adequately addressed, not enough information
- Project began to share more information with the community in 2014
- Door-to-door outreach in neighborhoods affected by drilling
- Community Relations Plan prepared
- Implementation was not seen as enough

# **Expanded Community Involvement**

- Change in project team resulted in better communication with the public
- Better communication and access to information about project activities
- Project documents prepared that outline community engagement activities and opportunities

# **Improved Public Relations**

- Dramatic improvement as reflected by
  - Questions have dramatically changed to clarifications versus confrontational
  - Applause versus cursing
- Revising the community stakeholder involvement plan
- This should be iterative and dynamic progress





# **Current Project Timeline**



### **Questions?**



# **Backup Slides**

### **LNAPL Data Gaps**

 Interim measure bioslurping removed



KAFB Base Boundary

# Vadose Zone Interim Measure

 Bioventing area targeting rebound zone 50 – 300 feet below ground surface



Q2 2016 Benzene Plume Q2 2016 EDB Plume KAFB Base Boundary

Lege

### **LNAPL Interim Measures**

#### **EDB In Situ Biodegradation**

 Treating EDB trapped in smeared LNAPL through anaerobic biodegradation

#### Air-lift Enhanced Bioremediation

 Treating smeared LNAPL through aerobic biodegradation





# **CSI Tools**

#### **Geographical Information System**

 Platform for maintaining, communicating, and analyzing site data

### Geostatistical Temporal/Spatial optimization software

• Evaluates sampling frequency and monitoring network along with visualization of non-linear trends

#### **Sequence Stratigraphy**

 A best fit interpretation of imperfect data sets including geophysical and lithologic logs integrated in the context of depositional analogues

#### **Groundwater Modeling**

• Analytic element and finite difference

