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**NEW MEXICO
ENVIRONMENT DEPARTMENT**

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED



James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

October 2, 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: GROUNDWATER MONITORING WORK PLAN
BULK FUELS FACILITY SPILL SOLID WASTE MANAGEMENT UNITS ST-106 AND SS-111
KIRTLAND AIR FORCE BASE, NEW MEXICO
EPA ID# NM6213820974
HWB-KAFB-BFFS-MISC**

Dear Colonel Miller and Lt. Colonel Acosta:

Currently, groundwater monitoring for the Bulk Fuels Facility Spill (BFFS) area is conducted under five separate monitoring plans. This is attributable to the Permittee, over time, providing new monitoring plans specific to newly installed wells rather than adding the new wells to existing NMED-approved groundwater monitoring plans.

The current plans that contain groundwater monitoring requirements include the following:

1. *Operations and Maintenance Plan Groundwater Treatment System, Bulk Fuels Facility, Solid Waste Management Unit ST-106/SS-111, Kirtland Air Force Base, New Mexico, Revision 0*, dated August 2016. This plan was submitted to NMED on August 18, 2016 and approved with modifications on December 12, 2016.
2. *Work Plan for Bulk Fuels Facility Expansion of the Dissolved-Phase Plume Groundwater Treatment System Design, Solid Waste Management Unit ST-106/SS-111, Kirtland Air Force Base, New Mexico, Revision 2*, dated January 2017.

This plan was submitted to NMED on January 31, 2017 and approved with conditions on May 31, 2017.

3. *Work Plan for Vadose Zone Coring, Vapor Monitoring, and Water Supply Sampling, Bulk Fuels Facility, Solid Waste Management Unit (SWMU) ST-106/SS-111, Kirtland Air Force Base, New Mexico, Revision R1*, dated December 2017. This plan was submitted to NMED on December 15, 2017 and approved with conditions on February 23, 2018.
4. *Work Plan for Data Gap Monitoring Well Installation, Bulk Fuels Facility, Solid Waste Management Unit (SWMU) ST-106/SS-111, Kirtland Air Force Base, New Mexico*, dated December 20, 2017. This plan was submitted to NMED on January 3, 2018 and approved with conditions on February 28, 2018.
5. *Work Plan for Bioventing and Air-Lift Enhanced Bioremediation Pilot Tests, Bulk Fuels Facility, Solid Waste Management Unit (SWMU) ST-106/SS-111, Kirtland Air Force Base, New Mexico, Revision R1*, dated November 2017. This plan was submitted to NMED on November 28, 2017 and approved with conditions on April 6, 2018.

In order to better organize the groundwater monitoring conducted as part of the BFFS corrective action and to address the requirement for groundwater monitoring plan annual updates, a groundwater monitoring work plan that includes all ongoing periodic monitoring must be created to consolidate the existing plans and ensure that all updates are included in the BFFS monitoring efforts. A single groundwater monitoring work plan to consolidate all monitoring conducted will increase efficiency, facilitate review of groundwater monitoring reports, and likely reduce overall costs associated with monitoring and reporting.

Air Force staff have indicated that contracting issues may preclude the Permittee from providing a consolidated groundwater monitoring work plan at this time. In recognition of this, the Permittee may submit updated revisions for each of the five work plans if it is not feasible at this time to submit a consolidated groundwater monitoring workplan. However, the expectation is that the Air Force will work towards eventually submitting a consolidated plan.

The Permittee must submit the initial comprehensive Bulk Fuels Facility Spill Groundwater Monitoring Plan, or the five monitoring plan revisions, no later than **February 26, 2021**. The plan or plans must describe the monitoring conducted at the BFFS and include descriptions of the proposed sampling methods, analytical methods, sampling frequency, and the locations of all wells included in the monitoring program. In addition, the work plan(s) must be updated annually on **April 1st** of each subsequent year, if necessary. The updates must include changes such as the addition of new wells to the monitoring network and incorporate any proposed changes to the monitoring program (e.g., sampling frequency, analytical suite, sample

collection methods). If no changes to the plan are proposed, the Permittee must submit a letter(s), specific to the plan(s), by **April 1** of the corresponding year stating that no changes to the monitoring program are proposed.

Should you have any questions, please contact me at (505) 476-6035, or your staff may contact Ben Wear at (505) 476-6041.

Sincerely,

Kevin M. Pierard, Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
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File: KAFB 2020 Bulk Fuels Facility Spill and Reading