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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 26, 2019

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 Engineering Division
2050 Wyoming Blvd SE, Suite 116
Kirtland AFB, NM 87117

**RE: REJECTION
MEMORANDUM FOR NEW MEXICO ENVIRONEMNT (SIC) DEPARTMENT
KIRTLAND AIR FORCE BASE, NEW MEXICO
EPA ID # NM9570024423
HWB-KAFB-19-005**

Dear Colonel Miller and Colonel Acosta:

The New Mexico Environment Department (NMED) received the U.S. Air Force (Permittee) Kirtland Air Force Base (KAFB or Facility) *Memorandum for New Mexico Environemnt (sic) Department* (Memo) on May 30, 2019. The Memo references a document titled *Vapor Intrusion Data Gap Soil Solid Waste Management Unit ST-106/SS-111 Vapor Sampling Work Plan, Bulk Fuels Facility* (Work Plan). It is unclear whether the Memo was intended to substitute for the Work Plan required by NMED's letter dated February 25, 2019.. The submitted Memo consists of various attachments containing unnumbered pages. Since the Memo was all that was submitted, NMED-HWB reviewed the Memo as a replacement for the actual Work Plan. NMED determined that the document is unreviewable and hereby issues this Rejection. The Permittee must address the following comments.

1. Work Plan Format

NMED Comment: The Memo was not submitted in a format that is acceptable as a work plan. Section 6.2.4.2 of the KAFB Permit presents the sections required for an Investigation Work Plan. The Permittee provided no title page, no signature block or certification, no executive summary, no table of contents, no introduction, no background information, and no description of site conditions. In addition, the pages of the attachments contain no page numbers making it difficult to reassemble the document in proper order once the pages were separated. In order for NMED to provide comments detailing where issues are found, as well as for the public to be able to review the document in the Administrative Record, every page of every document submitted must be numbered appropriately. The Permittee must submit a work plan in the appropriate format, including addition of the appropriate information in the appropriate required sections, based on the Permit requirements and must sequentially number every page contained in the document.

2. Document Certification

NMED Comment: NMED's February 25, 2019 letter requiring the submittal of a soil vapor sampling work plan specifically states, "[p]ursuant to 40 C.F.R. § 270.11(d)(1), all corrective action documents, including those outlined in this letter, shall include a certification, signed by a responsible official, stating:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

The Permittee did not provide the certification as required. Failure to provide the certification in future documents may result in rejection of the documents. Provide the signed certification in the Work Plan.

3. Soil Vapor Monitoring Point Locations

Permittee Statement: "Temporary vapor monitoring point locations have been selected within the residential area north of Ridgecrest as well as within the VA Medical Center campus and a location in the utility easement south of Gibson Boulevard SE. These sampling

locations and depth intervals were selected in consultation with NMED and advice offered during the 24 April 2019, Technical Working Group meeting.”

NMED Comment: The NMED-HWB has no record of the rationale used for selection of vapor monitoring point locations. The Permittee provided no background information or rationale for choosing the proposed soil vapor monitoring wells. Provide a record of the selection of vapor monitoring locations, as well as background information and the rationale for each soil vapor monitoring point location, in the Work Plan.

In addition, NMED does not agree with the installation of temporary wells. Soil vapor monitoring related to vapor intrusion will be required of the Permittee for as long as VOCs are present in the subsurface anywhere at the site above the vapor intrusion screening levels and subsurface flow is being manipulated through various SVE, bioventing, or other pilot tests and/or interim measures. In addition, the proposed upside-down buried bucket equipment cover is not appropriate. The Permittee must propose to install permanent surface completions for all new soil vapor monitoring wells. Since these will be permanent for the foreseeable future, NMED recommends using stainless steel tubing instead of the proposed Teflon tubing. Should the Teflon tubing fail, the Permittee may be required to reinstall the affected vapor monitoring wells.

4. Proposed Temporary Vapor Monitoring Point Construction

Permittee Statement: “Bentonite chips (1/4-inch) will be placed in the boring opposite the vapor ports”

NMED Comment: NMED is unclear as to why the Permittee would propose this as part of well construction. It appears to suggest that the soil vapor sampling ports will be encased in bentonite, which is not appropriate. Provide a more detailed and thorough description of the proposed well construction and a discussion of how the Permittee will ensure that the sampling ports are located and screened appropriately in the revised Work Plan. In addition, the Permittee did not provide a description of or specifications for the sampling ports. Provide this information in the Work Plan

5. Decontamination

Permittee Statements: “Soil vapor sampling equipment will consist of single use disposable Teflon tubing and dedicated vapor monitoring point sterile hose barbs and flow control valves; therefore, no decontamination of soil vapor sampling equipment will be necessary.”
and

“All Teflon tubing proposed for the sample train will be single-use disposable for each individual monitoring point. Hose barb connectors and flow control valves will be sterilized by boiling in deionized water prior to initial use and between uses.”

NMED Comment: These statements contradict each other. In addition, it is unclear why field supplies would require sterilization. Provide a detailed description of the proposed technique to boil fittings in the field and how this nonstandard technique accomplishes decontamination. Resolve the discrepancy and provide the information in the Work Plan.

6. Figure 4: Proposed Soil Vapor Sampling Equipment, Methods and Purge Parameters

NMED Comment: The schematic provided for the sample train for collecting soil vapor samples is not adequate. A three-way valve should be included in the Teflon tubing above the Summa canister. The valve must shut off flow to the pump prior to opening the valve to the Summa canister for sample collection. The valve will prevent the Summa canister vacuum from drawing air backwards from the sensors and pump. Revise the figure for the Work Plan to include an appropriate mechanism to ensure soil vapor sample collection procedures are collecting representative samples.

7. Field Instruments

Permittee Statement: "During sampling of each soil vapor monitoring point, field parameters including total ionizable volatile hydrocarbons...will be measured using...a Lantec GEM 2000 photoionization detector."

NMED Comment: The Permittee must provide the details of the photoionization detector, including the photon energy of the lamp. In addition, the Permittee must provide detailed information on calibration gases for all field instruments and how they are applicable to the contaminants and concentrations expected at the site. Provide this information in the Work Plan.

8. Laboratory Analysis

Permittee Statement: "Table 1 shows 1,2-Dibromoethane (EDB) as the only COPC with an LOQ exceeding the VISL. Although the cited MDL value for EDB is below the VISL, the LOQ and MDL values do not account for dilution from canister pressurization. After the pressurization dilution factor is applied to the base LOQ and MDL, these values are expected to increase by ~1.5X for six-liter samples and 2.8X for one-liter samples."

NMED Comment: The Permittee must utilize a laboratory and analytical methodology that have LOQ and MDL values below the VISLs. The Permittee cannot demonstrate that a site requires no further action based on data with LOQs that exceed the screening levels. The Permittee must make a demonstrated effort to find a laboratory and analytical method that can achieve an LOQ below the VISL.

9. Reporting

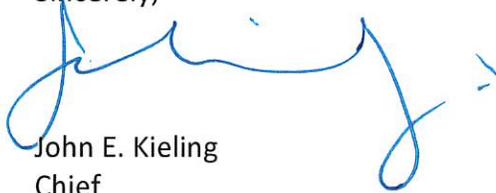
Permittee Statement: "A draft technical memorandum will be prepared and submitted within 30 days of data validation."

NMED Comment: NMED does not accept draft documents. In addition, a memorandum is not the appropriate reporting document. The Permittee must propose to submit a report that summarizes the work conducted that includes descriptions of all work performed and presents the results of the investigation. Propose to submit a report in the Work Plan accordingly.

The Permittee must submit a Work Plan for NMED approval that addresses all comments contained in this Rejection and includes a proposed schedule to implement the work. Two hard copies and two electronic versions (on separate discs) of the revised Work Plan must be submitted to the NMED Hazardous Waste Bureau. The Work Plan must be accompanied with a response letter that details where all of NMED's comments have been addressed. The Work Plan must be submitted to NMED no later than **October 31, 2019**.

If you have any questions regarding this letter, please contact Ben Wear at (505) 476-6041.

Sincerely,



John E. Kieling
Chief

Hazardous Waste Bureau

cc: S. Stringer, NMED RPD
D. Cobrain, NMED HWB
R. Murphy, NMED HWB
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