



BILL RICHARDSON
Governor
DIANE DENISH
Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

Ground Water Quality Bureau

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RON CURRY
Secretary
JON GOLDSTEIN
Deputy Secretary

June 23, 2009

Mr. Wayne Bitner
United States Air Force
377 ABW/EMR
2050 Wyoming Blvd. SE
Kirtland AFB
Albuquerque, New Mexico 87117-5270

Re: NMED Notice of Deficiency for Modified Stage 2 Abatement Plan Schedule of Activities for Kirtland SS-111 Bulk Fuel Facility at Kirtland Air Force Base (KAFB), Albuquerque, New Mexico

The New Mexico Environment Department (NMED) Ground Water Quality Bureau disapproves the proposed phased schedule of activities dated February 12, 2009, that was submitted by the U.S. Air Force to this office for review on February 17, 2009. NMED hereby notifies you that the above-referenced document is deficient for the following reasons:

1. In its proposal, KAFB uses "FY09, FY10, FY11, & FY12" in describing annual cycles for work to be completed. All work commitments need to cite the specific calendar dates by which they will be initiated and completed.
2. KAFB proposes a three-year time horizon for implementing dissolved-phase Stage 2 Abatement plan at SSS-111. NMED does not approve of the extended period of time proposed for this activity. NMED requires that no more than 120 days shall pass between completion of the dissolved-phase investigation and submittal of a Stage 2 AP for the full-scale abatement of off-base dissolved phase ground water contamination.
3. NMED expects that off-base remediation activities, including both LNAPL recovery *and* dissolved-phase ground water remedial action, will be undertaken at the soonest practicable juncture. The proposed schedule does not reasonably accomplish this goal.

NMED requires that KAFB submit a revised document to cure the deficiencies listed above. Please submit a revised document to NMED by July 24, 2009.

Mr. Wayne Bitner
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NMED thanks you for your on-going cooperation in this matter. If you have any questions about this letter, please contact Alex Puglisi at (505) 827-2754 or Baird Swanson, Project Manager, at (505) 222-9520.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Olson". The signature is fluid and cursive, with the first name "W." and the last name "Olson" clearly visible.

William C. Olson, Chief
Ground Water Quality Bureau

Cc: Alex Puglisi, GWQB/ROS Program Manager
Barbara Gastian, ABCWUA, P.O. Box 1293, Albuquerque, NM 87103
Alex Mora, AEHD, P.O. Box 1293, Albuquerque, NM 87103
Billy Gallegos, AEHD, P. O. Box 1293, Albuquerque, NM 87103
Mary Lou Leonard, AEHD, P. O. Box 1293, Albuquerque, NM 87103
Baird Swanson, NMED District 1 File
Reading file

ENVIRONMENT DEPARTMENT ROUTING SLIP

LETTER / MEMO TO: Ludie Bitner

FOR APPROVAL BY: William C. Olson

DRAFTED BY: Baird Swanson DATE: 4/20/09

SUBJECT: NOD Reply to KAFB Stage 2 AP Schedule

FINAL DECISION NEEDED BY: 6/1/09 REASON: Letter date

FEE RECEIVED? FIRST YEAR FULL PAYMENT

REVIEW:

APPROVED:		INITIAL	DATE REC'D	DATE APPR'V'D
_____	SUPERVISOR	_____	_____	_____
<u>Alex Puglisi</u>	PROG. MANAGER	<u>AAP</u>	_____	<u>05/18/09</u>
<u>William Olson</u>	BUREAU CHIEF	<u>WO</u>	_____	<u>6/22/09</u> <i>adits</i> <u>6/19/09</u>
_____	GRANTS	_____	_____	_____
_____	INTERNAL AUDIT	_____	_____	_____
_____	BUDGETS	_____	_____	_____
_____	LEGAL	_____	_____	_____
_____	ASD DIRECTOR	_____	_____	_____
_____	WWMD DIRECTOR	_____	_____	_____
_____	ERD DIRECTOR	_____	_____	_____
_____	DEP. SECRETARY	_____	_____	_____
_____	SECRETARY	_____	_____	_____
_____	OTHER	_____	_____	_____
_____	OTHER	_____	_____	_____
_____	OTHER	_____	_____	_____

COMMENTS BY DRAFTER OR REVIEWER(S):

Review by Dana requested By Bill Olson- Not routed through Cathy.