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RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 17, 2015

Colonel Eric H. Froehlich
Base Commander
377 ABW/CC
2000 Wyoming Blvd. SE
Kirtland AFB, NM 87117-5606

John Pike
Director, Environmental Management Services
377 MSG
2050 Wyoming Blvd. SE, Suite 116
Kirtland AFB, NM 87117-5270

**RE: REVISED QUARTERLY PRE-REMEDY MONITORING AND SITE
INVESTIGATION REPORTS
BULK FUELS FACILITY SPILL
SOLID WASTE MANAGEMENT UNITS ST-106 AND SS-111
KIRTLAND AIR FORCE BASE
EPA ID# NM9570024423, HWB-KAFB-15-MISC**

Dear Colonel Froehlich and Mr. Pike:

The New Mexico Environment Department (NMED) is in receipt of the Kirtland Air Force Base (the Permittee) proposed changes to the *Quarterly Pre-Remedy Monitoring and Site Investigation Reports*, dated May 12, 2015. The proposed changes include:

- Discontinuation of sampling/reporting for 97 specific analytes for which there were no detections above regulatory standards in quarterly sampling during 2013-2014.
- Revising text, tables, figures and appendices to be non-cumulative and to only include data from the specific quarter addressed by the report. The Permittee, however, still intends to comply with Comment No. 31 in NMED's August 17, 2011 letter with respect to data exports in Appendix E.
- Reduction of report figures to only include data that are currently driving decisions.

The Permittee's proposed changes to the quarterly monitoring and reporting practices are hereby approved with the following conditions:

1. The Permittee shall continue to monitor for calcium, magnesium, potassium and sodium in groundwater, and shall report the test results in the quarterly reports.

2. The Permittee shall summarize vapor, groundwater, and remediation system monitoring data in tables. All data tables shall include only detected analytes and data quality exceptions that could potentially mask detections. Data presented in the tables shall include the current data plus data from the three previous monitoring events or, if data from fewer than three monitoring events is available, data acquired from the three most recent monitoring events during previous investigations, if any, must be provided. The dates of data collection shall be included in the tables.
3. The Permittee shall submit, in addition to the full Quarterly Report, an Executive Summary of the Quarterly Report, written for the lay public and with embedded figures, that includes the following information:
 - a. A brief summary of ongoing investigation and cleanup actions, with reference to availability of the full Quarterly Report for those who are interested;
 - b. Figures and written summaries of cumulative amounts of product recovered/biodegraded in the soil and groundwater;
 - c. Descriptions of new groundwater or soil vapor wells and new test parameters, if any;
 - d. Identification and discussion of any significant changes in contamination concentrations or distributions;
 - e. Cumulative groundwater maps for benzene, EDB, and dissolved oxygen;
 - f. A map of groundwater natural attenuation parameters including electron acceptors, alkalinity and bromide (or split into multiple maps if necessary for clarity);
 - g. Cumulative soil vapor maps and depth slices for total VOCs and benzene;
 - h. Any other monitoring data deemed by the Permittee to be important in driving decisions; and
 - i. Descriptions of newly initiated or planned investigations, tests or studies.
4. The Permittee shall, no later than by August 1, 2015, submit a draft of the Executive Summary described in Condition #2 above for data gathered in the first quarter of 2015.
5. The Permittee shall fully implement the changes to sampling and reporting approved in this letter for data gathered in the second quarter of 2015.

NMED technical staff will assist you and your contractor in any way possible to evaluate and optimize sampling and reporting practices.

If you have any questions, please contact me at 505-827-2855.

Col. Froehlich and Mr. Pike
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Sincerely,



Kathryn Roberts
Director
Resource Protection Division

KR/DM

cc: Col. T. Haught, KAFB
Wayne Bitner, KAFB
Herbert Bohannon, KAFB
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