



NEW MEXICO
ENVIRONMENT DEPARTMENT

ENTERED



Hazardous Waste Bureau

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 10, 2009

Mr. Wayne Bitner
Chief, Restoration Section
377 MSG/CEANR
2050 Wyoming Blvd., Suite 118
Kirtland AFB, NM 87117-5270

RE: DENIAL OF REQUEST TO TERMINATE INTERIM CORRECTIVE MEASURES (ICM) FOR SOLID WASTE MANAGEMENT UNIT (SWMU) WP-26, SEWAGE LAGOONS AND GOLF COURSE MAIN POND, OCTOBER 2, 2008 KIRTLAND AIR FORCE BASE, EPA ID# NM9570024423 KAFB-07-015

Dear Mr. Bitner:

The New Mexico Environment Department (NMED) has reviewed the subject letter requesting termination of Interim Corrective Measures (ICM) activities at the Kirtland Air Force Base (KAFB) Golf Course Main Pond (GCMP). The ICM treats the nitrate contamination found in groundwater underlying the GCMP by extracting nitrate-contaminated groundwater from wells at the Golf Course and placing the water into the GCMP for use in irrigating the KAFB Golf Course. This not only removes nitrate-contaminated perched groundwater before it impacts the regional aquifer (from which KAFB and the city obtains its drinking water), but also it reuses the water in a manner that formerly utilized uncontaminated groundwater with nitrate added as fertilizer.

The nitrate plume extends southeast (at least) from Sandia National Laboratory's Technical Area 2 to the KAFB Golf Course. The impact of the GCMP on the plume is indicated by the water-table mound under the pond created by infiltration of supernatant water pumped from the former KAFB Sewage Lagoons. Lack of nitrate in the soil column beneath the GCMP (as determined by

KAFB3276



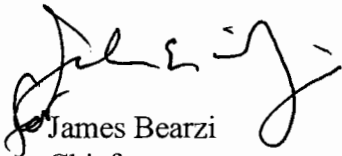
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KAFB in the 2006 RFI Comprehensive Report for SWMU WP-26, August 2007) is not an indicator that the GCMP did not leak nitrate-laden effluent into the perched aquifer, the high volume of water from the leaking ponds flushed nitrate and most other contaminants from the soil column. NMED sees no compelling evidence from any of the reports mentioned in the subject letter suggesting that the GCMP is not a source for all or part of the nitrate plume underlying the GCMP.

Termination of the subject ICM is dependent upon nitrate in the perched aquifer declining to levels under 10 mg/L. The request to terminate the ICM is therefore denied.

If you have any questions please contact Mr. William McDonald of my staff at (505) 222-9582.

Sincerely,



James Bearzi
Chief
Hazardous Waste Bureau

cc: J. Kieling, NMED HWB
W. Moats, NMED HWB
W. McDonald, NMED HWB
L. King, EPA 6PD-N
File: Reading and KAFB 2009
HWB-KAFB-07-015