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JUL 30 2009

Colonel Michael S. Duvall
Commander
2000 Wyoming Blvd SE
Kirtland AFB, NM 87117-5000



Mr. William C. Olsen
Groundwater Quality Bureau (GWQB)
New Mexico Environment Department (NMED)
PO Box 26110
Santa Fe NM 87502

Dear Mr. Olsen

Kirtland AFB is providing the following responses to your 23 Jun 09 letter notifying Kirtland AFB of a Notice of Deficiency for the *Modified Stage 2 Abatement Schedule of Activities for Kirtland SS-111, Bulk Fuels Facility, Kirtland AFB*, submitted to you in a memorandum dated 12 Feb 09. The three deficiencies cited (*italicized*) are stated below with response:

1. *In its proposal, KAFB uses "FY09, FY10, FY11, and 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.*

KAFB will provide specific calendar dates for work activities to be proposed in the schedule for our Stage 2 Abatement Plan (S2AP) for abatement of the off-base dissolved phase groundwater contamination.

2. *KAFB proposes a three-year time horizon for implementing dissolved-phase Stage 2 Abatement Plan at SS-111. NMED does not approve the extended period of time proposed for this activity. NMED required 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 remediation of the off-base dissolved phase groundwater contamination.*

KAFB will submit a S2AP for the full-scale remediation of the off-base dissolved-phase groundwater contamination within 120 days of the completion of the dissolved-phase investigation. KAFB proposes the start of the 120-day period begin after NMED review and approval of the results of the dissolved-phase

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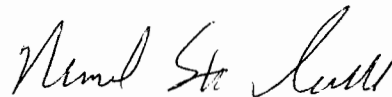
investigation. KAFB proposes to submit the results of the dissolved-phase contamination in the next semi-annual report scheduled to be provided 30 Nov 09. This will permit initial monitoring of the three groundwater monitor wells installed in June 2009 (KAFBs-10621, 10622 and 10623) to be sampled as part of the scheduled July 2009 quarterly monitoring event and used to investigate the off-base dissolved-phase groundwater contamination. This data, in conjunction with data from the July 2009 monitoring of the other groundwater monitor wells installed to investigate the fuel plume, will provide the first complete evaluation of the off-base dissolved-phase groundwater contamination.

3. *NMED expects that off-base remediation activities, including both LNAPL recovery and dissolved-phase groundwater remedial action, will be undertaken at the soonest practicable juncture. The proposed schedule does not reasonably accomplish this goal.*

In the S2AP, KAFB will provide a schedule of the proposed remediation of both the LNAPL and dissolved-phase groundwater contamination. The schedule will propose realistic timeframes based on our prescribed schedule for funding requests and receipt, as well as public comment and NMED approval, of the proposed remedial activities. To expedite these timeframes, KAFB plans to submit accelerated funding requests, which will be subject to available funding.

If you have any questions with regard to this submittal, please contact Mr. Mark Holmes at (505) 846-9005.

Sincerely



MICHAEL S. DUVALL, Colonel, USAF
Commander

cc:

VA Hospital, Mr. Richter
ABCWUA, Ms. Gastian
COA AEHD, Mr. Soladay
NMED GWQB, Mr. Swanson
NMED HWB, Mr. Kieling
NMED HWB, Mr. McDonald
USEPA-Region 6 (6PD-N), Ms. King
AFCEE/CMSE, Mr. Oyelowo
AFCEE/ICE, Ms. Doll
CH2MHill, Ms. Minchak
Admin. Record, CNM, Montoya Campus
AR/IR
File