



BILL RICHARDSON
Governor

DIANE DENISH
Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.nmenv.state.nm.us



RON CURRY
Secretary

SARAH COTTRELL
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 22, 2010

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

**RE: NOTICE OF DISAPPROVAL: 2009 RESOURCE CONSERVATION AND RECOVERY ACT FACILITY INVESTIGATION REPORT FOR SOLID WASTE MANAGEMENT UNIT WP-026, SEWAGE LAGOONS AND GOLF COURSE MAIN POND, SEPTEMBER 2009
KIRTLAND AIR FORCE BASE, EPA ID# NM9570024423
KAFB-09-011**

Dear Mr. Bitner:

New Mexico Environment Department (NMED) personnel have reviewed the *2009 Resource Conservation and Recovery Act Facility Investigation Report for Solid Waste Management Unit WP-026, Sewage Lagoons and Golf Course Main Pond* (Report), dated September 2009. NMED finds the Report deficient, and hereby issues this Notice of Disapproval (NOD). Kirtland Air Force Base (the Permittee) must address the comments contained herein before NMED can take final action on the Report.

Comments

1. Water-level elevation contours on Figure 2-22 (Groundwater Elevations Perched Zone) do not concur with groundwater elevation data (i.e., the perched aquifer 5,155 ft elevation contour and groundwater elevation data for KAFB-2622 [5,154.87 ft]). The Permittee must correct the subject map so that water-table elevation contours are consistent with water-level

KAFB3497



data.

2. Perched water-level elevation contours are not contiguous with other portions of perched systems surrounding WP-026. The Permittee must provide a perched groundwater elevation map that clearly shows the connectivity (or lack thereof) of the perched groundwater at WP-026 with the rest of the perched groundwater around WP-026.
3. KAFB-2625: The easting coordinate ("1,1546157.96 ft") reported on the Well Completion Diagram (Appendix D) is erroneous; the correct easting on Figure C-1 is 1,546,157.96 ft
4. KAFB-2624: The easting and northing coordinates in the Groundwater Database GIS do not agree with those in the Excel spreadsheet. The Permittee must provide the correct coordinates for this well.
5. KAFB-2626: The easting coordinate ("1, 1545655.89 ft") as shown on the Well Completion Diagram (Appendix D) is erroneous; the correct easting as shown on Figure C-1 (Appendix C) is 1,545,655.89 feet. The Permittee must correct this error.
6. KAFB-2627: The easting coordinate ("1, 1547246.35 ft") as shown on the Well Completion Diagram (Appendix D) is erroneous; the correct easting as shown on Figure C-1 (Appendix C) is 1,547,246.35 ft. The Permittee must correct this error.
7. The Permittee must provide the Department a copy of the surveyor's plat and survey for each monitoring well and borehole constructed for WP-026, and each monitoring well used for constructing the related regional and perched groundwater potentiometric surface maps.
8. KAFB-0504: The measuring-point elevation given in the groundwater-elevation spreadsheet differs from that given in the well information spreadsheet. The Permittee must resolve this discrepancy.
9. KAFB-0505: ground surface elevation is not given in Table B-12. Also, water-level elevation contours are not consistent with groundwater elevation data for this monitoring well (e.g., the regional aquifer 4,853 ft contour). The Permittee must resolve this discrepancy.
10. KAFB-0506: Ground surface elevation is not given in Table B-12. The Permittee must include this information.
11. KAFB-0522: Measuring point elevation given in the groundwater elevation spreadsheet (Section 2, Table 2-7, 5,264.81 ft) differs from that in the table titled *Groundwater Elevation Data, Kirtland Air Force Base, New Mexico, February 2009*, found in the Groundwater Database (5,262.95 ft). The Permittee must resolve the discrepancy.
12. The Permittee must submit to NMED, for its review and approval, a work plan for installing at least two additional regional monitoring wells for the purpose of improving the regional

groundwater model. These monitoring wells should be located as follows:

- A. One northeast of WP-026 at the Permittee's proposed location, and
- B. One southeast of WP-026 near KAFB-4.

13. The Permittee must submit to NMED, for its review and approval, a work plan for installing at least four additional perched monitoring wells at WP-026 so that the extent of the perched system at WP-026 is delineated north, south, east, and west of the site, and so that the relationship between perched groundwater at WP-026 and the perched nitrate plume east of WP-026 can be determined.

These monitoring wells should be located as follows:

- A. Northeast of the lagoons 600 feet northeast of the proposed new regional monitoring well location;
- B. Southeast of the lagoons near KAFB-4;
- C. 900 feet southwest of the lagoons; and
- D. 900 feet northwest of the lagoons.

In previous letters to the Permittee (i.e., *Request for Information Regarding Monitoring Well and Groundwater Quality Data*, dated October 23, 2008, and the subsequent *Preliminary Review of Response to the New Mexico Environment Department Request for Information Regarding Monitoring Well and Groundwater Quality Data* dated June 23, 2009) the Department expressed concerns over the Permittee's monitoring-well data that fell into the following categories: well location survey data, well screen locations, wells missing from the database, missing or unreadable geophysical logs, and groundwater elevation data problems. These concerns cast doubt on the Permittee's water-level maps and data synthesis efforts.

Until the Department's concerns are addressed, this and subsequent Long-Term Groundwater Monitoring and Summary Reports cannot be approved.

The Permittee must respond to the above comments by December 20, 2010. If you have any questions regarding this matter, please contact William McDonald of my staff at (505) 222-9582.

Sincerely,



James Bearzi
Chief
Hazardous Waste Bureau

JPB:wsm

Mr. Wayne Bitner
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cc: J. Kieling, NMED HWB
W. Moats, NMED, HWB
W. McDonald, NMED, HWB
L. King, EPA-Region 6 (6PD-N)
File: Reading and KAFB 2010