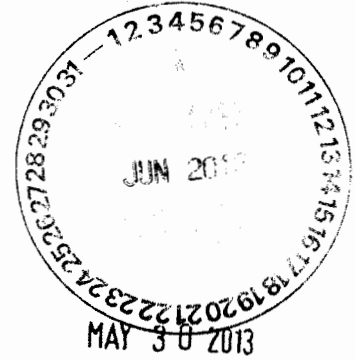




ENTERED

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 377TH AIR BASE WING (AFMC)



Colonel John C. Kubinec
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Mr. John Kieling, Manager
RCRA Permits Management Program
Hazardous Waste Bureau (HWB)
New Mexico Environment Department (NMED)
2905 Rodeo Park Road
Santa Fe New Mexico 87505

Dear Mr. Kieling

This letter is in reference to the following four NMED letters and associated response dates:

1. DISAPPROVAL, ADDITIONAL DATA REQUEST AND QUARTERLY PRE-REMEDY MONITORING AND SITE INVESTIGATION REPORT FOR APRIL – JUNE 2012, BULK FUELS FACILITY SPILL, SOLID WASTE MANAGEMENT UNITS ST-106 AND SS-111, OCTOBER 2012 dated February 1, 2013 with a required response by **June 6, 2013** (Per NMED Extension Approval letter dated 8 May 2013).
2. GEOPHYSICAL LOGS FOR WELLS INSTALLED FOR THE BULK FUELS FACILITY SPILL, SOLID WASTE MANAGEMENT UNITS ST-106 AND SS-111, KIRTLAND AIR FORCE BASE dated March 6, 2013 with a required response by **April 1, 2013**. This letter is superseded by list item 3 in this response.
3. OUTSTANDING GEOPHYSICAL LOGS FOR WELLS INSTALLED FOR THE BULK FUELS FACILITY SPILL, SOLID WASTE MANAGEMENT UNITS ST-106 AND SS-111, KIRTLAND AIR FORCE BASE dated May 23, 2013 with a required response by **July 11, 2013**.
4. PNEULOG TEST RESULTS, BULK FUELS FACILITY (BFF) SPILL, SOLID WASTE MANAGEMENT UNITS ST-106 AND SS-111, KIRTLAND AIR FORCE BASE dated May 10, 2013 with a required response by **May 31, 2013**.

The NMED February 1, 2013 letter contains numerous comments related to both geophysics and Pneu-log testing. Those comments are similar to those received in the March 6, 2013 and May 10, 2013 letters from the NMED. Consequently, response to the February 1, 2013 disapproval on the “*Quarterly Pre-Remedy Monitoring and Site Investigation Report for April – June 2012*” is tied to resolution of the March 6, 2013 and May 10, 2013 NMED letters.

KAFB4008



Any existing geophysical logs have been included in the "*Quarterly Pre-Remedy Monitoring and Site Investigation Report for October – December 2012*" delivered to the NMED on April 2, 2013. The nine newly installed groundwater monitoring wells (KAFB-106201 through KAFB-106209) and the nine Pneulog well clusters have not been logged to date due to an outstanding need for resolution of comments received on geophysical logs from the NMED. Groundwater monitoring wells KAFB-106043 and KAFB-106066 were mistakenly not logged following installation and will need to be logged following resolution of geophysical technical requirements. A meeting with the NMED is required to discuss the outstanding comments and resolve technical requirements before any additional wells can be logged. A statement has been added to the "*Quarterly Pre-Remedy Monitoring and Site Investigation Report for January – March 2013*," to be delivered to the NMED on June 28, 2013, clarifying which wells have not been geophysically logged to date.

Only three well clusters have been Pneulog tested to date and the data has been provided in the quarterly reports, specifically the "*Quarterly Pre-Remedy Monitoring and Site Investigation Report for October – December 2012*" delivered to the NMED on April 2, 2013. Per discussion at the May 17, 2013 working group meeting, KAFB will present to the NMED a technical justification for a proposed path forward at the remaining 6 well cluster locations. This justification is planned for presentation at a working group meeting and will be followed by submittal of an official response. A statement has been added to the "*Quarterly Pre-Remedy Monitoring and Site Investigation Report for January – March 2013*," to be delivered to the NMED on June 28, 2013, clarifying where Pneulog well testing has been completed.

In order to resolve the outstanding comments in all four letters discussed above my staff has requested a meeting with the NMED and a meeting will likely be scheduled during the week of 10 June 2013. Additionally, I am requesting an extension of **16 August, 2013** for submitting our responses to the subject letters. This extension allows adequate time for formal response based on the agreed upon path forward during the next working group.

Please contact Mr. L. Wayne Bitner at (505) 853-3484 or at ludie.bitner@kirtland.af.mil or Ms. Victoria R. Martinez at (505) 846-6362 or at victoria.martinez@kirtland.af.mil if you have questions.

Sincerely



JOHN C. KUBINEC, Colonel USAF
Commander

cc:
NMED-RPD (Skibitski)
NMED-HWB (Moats, McDonald, Salem, Brandwein)
NMED-GWQB (J. Schoeppner)
NMED-OGC (L. Barnhart)
EPA Region 6 (L. King)
AFCEE/CMSE (Mr. Oyelowo)
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