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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

March 3, 2015

Colonel Tom D. Miller  
Base Commander  
377 ABW/CC  
2000 Wyoming Blvd. SE  
Kirtland AFB, NM 87117-5000

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

**RE: DISAPPROVAL  
RESPONSE TO SECOND NOTICE OF DISAPPROVAL, PROPOSED  
AMENDMENT OF THE CLOSURE PLAN FOR THE OPEN DETONATION  
UNIT, JULY 10, 2014  
KIRTLAND AIR FORCE BASE, EPA ID # NM9570024423  
HWB-KAFB-10-005-OD**

Dear Col. Miller and Mr. Pike:

The New Mexico Environment Department (NMED) has reviewed the U. S. Air Force (Permittee) July 10, 2014 response to the NMED's March 27, 2014 Notice of Disapproval (NOD) for the March 2013 submittal of an amended Closure Plan for the Open Detonation (OD) Unit. The Permittee's response included a revised OD Unit Closure Plan (Plan) dated May 2014.

The NMED has identified deficiencies in the Permittee's response that must be corrected before NMED can approve the Plan.

**Comment Specific to Comment #8 of the March 27, 2014 NOD:** This comment required, in part, that the Groundwater Sampling and Analysis Plan (Section 2.1.2 of the Plan) state that "if the Permittee determines that there is statistically significant evidence of contamination at any monitoring well, the Permittee shall notify the Department of this fact within 15 days of this discovery". This statement was not included in the Plan. Revise the Plan to include this statement in Section 2.1.2.3 (*Groundwater Data Analysis*).

**New Comment #1:** Page number "166 of 183" of the Plan is followed by page number "168.1 of 183" with the page numbering sequence continuing to page number "168.58 of 183". This

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non-standard page numbering format is also included in the Table of Contents. Revise the page numbers of the Plan to the standard format for page numbering with page number 166 followed by page number 167, et cetera. In addition, the Table of Contents must be revised to include the subsections under Section 2 (*Closure Procedures*).

**New Comment #2:** The March 2013 version of the Plan included Section 1.6 (*Amendment of Closure Plan*), Section 1.7 (*Closure and Post-Closure Cost Estimate, Financial Assurance and Liability Requirements*) and Section 1.8 (*Closure Certification*). These Sections have been deleted from the Plan. Revise the Plan to include these three Sections in their former locations.

**New Comment #3:** The last sentence on Page 162 of 183 refers to Table **D-4** of Permit Attachment D, which is an incorrect reference. This reference must be changed to Table **D-3**.

**New Comment #4:** The titles of Tables H-2 and H-3 still include a reference to the Open Burn (OB) Unit. Since the Plan only addresses the OD Unit, delete the OB Unit references.

**New Comment #5:** Table H-2 of the Plan provides a column showing the New Mexico Water Quality Standards. Eleven of the constituent standards do not match their actual standard. These constituents include nitrate, nitrite, chloride, sulfate, fluoride, boron, manganese, molybdenum, nickel, strontium and total dissolved solids. The Permittee must revise this table to reflect the correct standards.

**New Comment #6:** Attachment 1 (*Monitoring Well Installation Work Plan*) of the March 2013 version of the Plan included Section 2.6 (*Investigation Derived Waste*) and Section 2.7 (*Site Safety and Health Plan*). These Sections have been deleted from the current Plan. Revise the Plan to include these two Sections in their former locations.

**New Comment #7:** Section 2.1.2.3 (*Groundwater Data Analysis*) of the Plan addresses how the Permittee proposes to determine if there is statistically significant evidence of groundwater contamination by comparing monitoring data to baseline constituent concentrations and applicable groundwater standards. Baseline constituent concentrations are to be established by calculating a "95% upper tolerance limit" (UTL) for each detected constituent. However, it is unclear what is meant by the term "95% upper tolerance limit". Additionally, this Section does not address procedures to be followed, if an UTL cannot be established for a given naturally occurring inorganic constituent. Finally, given that few wells are listed as being at locations that are potentially useful to provide baseline concentration data, NMED is concerned that the Permittee will have difficulty in providing an appropriate sample population to establish an UTL for any given constituent. The Permittee must revise this Section of the Plan to: 1) specify the coverage and the confidence level that will be used to establish the UTL, 2) specify what statistical method will be used in lieu of calculating the UTL if an UTL cannot be calculated for a constituent and, 3) provide additional detail on how an appropriate sample population will be established.

In addition, the Plan does not address procedures to be followed if an UTL for a constituent exceeds a groundwater standard or what will be done should there be a detection of

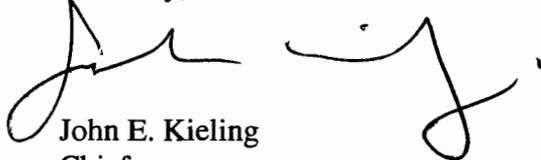
anthropogenic compounds or constituents that are not naturally occurring. Revise the Plan to include the proposed procedures to address this possibility. Additionally, the last sentence of this Section states that "A detailed description of the process to determine baseline concentrations can be found in the *Long-Term Groundwater Monitoring Summary and Baseline Determination Report, Fiscal Year 2005 (USAF, 2007)*". The Permittee must extract the applicable detailed description of the baseline determination process from this Report to address the above concerns and include it in the Plan.

**New Comment #8:** The last sentence of Section 3.2 (*Waste Characterization*) on Page 168.55 of the Plan states that "PPE shall be handled in accordance with Section 1.4 of this Permit Attachment (H)...", which is incorrect. This sentence must be corrected to reference Section 2.2, which contains the information in question.

The Permittee must submit revisions to the Plan that corrects the deficiencies noted in this letter by **May 27, 2015**. As part of the response, the Permittee must include a copy of the July 2010 OD Unit Permit showing where all proposed revisions have been made to the Permit Parts and the proposed revised OD Unit Closure Plan based on the comments in this letter. The revisions must provide both a "clean" version and a "redline/strikeout" version, and must be submitted in the form of two paper copies and one electronic copy for both the clean and redline/strikeout versions. In order to expedite review of the responses, please provide a matrix table of the comments that cross-reference the responses.

If you have any questions regarding this letter, please contact Mr. David Strasser of my staff at (505) 222-9526.

Sincerely,



John E. Kieling  
Chief  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
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