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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

June 18, 2015

Tom D. Miller, Colonel  
Base Commander  
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John Pike  
Director, Environmental Management Services  
377 MSG  
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Kirtland AFB, NM 87117-5270

**RE: DISAPPROVAL  
SITE INVESTIGATION WORK PLAN EOD HILL  
KIRTLAND AIR FORCE BASE, ALBUQUERQUE, NEW MEXICO  
EPA ID # NM9570024423  
HWB-KAFB-10-003**

Dear Colonel Miller and Mr. Pike:

The New Mexico Environment Department (NMED) received Kirtland Air Force Base's (Permittee) *Site Investigation Work Plan EOD Hill* (Work Plan), dated April 2013 on June 5, 2013. NMED has reviewed the Work Plan and hereby issues this Disapproval with the following comments:

**1. Section 2.4.1, Geology and Hydrogeology, p.2-2, second paragraph**

**Permittee's Statement:** "A geologic map of the study area, depicting geologic units and fault orientation, is shown on Figure 2-4."

**NMED's Comment:** Comment 8 of the *Second Notice of Disapproval, Draft Site Investigation Work Plan, EOD Hill, June 2010* (2010 NOD) dated October 28, 2010, states that the map is known to be inaccurate based on NMED's site visits conducted on February 22 and March 4, 2010. Amend the section to better reflect the geologic study completed as directed in the 2010 NOD.



**2. Section 2.4.1, Geology and Hydrogeology, p. 2-4, last paragraph**

**Permittee's Statement:** "EOD-BH appears to have penetrated a confined aquifer in the limestone bedrock that is likely controlled by fracture patterns within the unit."

**NMED's Comment:** Comment 10 of the 2010 NOD directed the Permittee to revise the Work Plan as there is insufficient evidence that the aquifer is under confining conditions. Revise the Work Plan accordingly.

**3. Section 2.4.1, Geology and Hydrogeology, p. 2-4, last paragraph**

**Permittee's Statement:** "A regional water table map is shown on Figure 2-6 of Appendix I."

**NMED's Comment:** The symbols and legend are largely unreadable but the title of the figure is "Geology of EOD Hills Area", and groundwater flow direction is not shown. Revise the statement and figure accordingly.

**4. Section 3.1.1.2, Soil/Rock Sampling**

**NMED's Comment:** Add a statement that lithologic logs and monitoring well construction details will be submitted to NMED in the Site Investigation report if wells are installed.

**5. Section 3.2, Quality Assurance/Quality Control**

**NMED's Comment:** This section is unchanged from the previous revision of the Work Plan. Comment 14 of the 2010 NOD stated, "[t]he Work Plan must specify in detail the quality assurance (QA) and quality control (QC) procedures that are to be implemented. The QA/QC procedures must include the types and frequencies of field and laboratory quality control samples to be prepared or collected, as appropriate (see Permit Sections 6.S.14, 6.S.17.6, 6.S.1S.1.1, 6.S.1S.1.3, and 6.S.1S.3)." The response to the 2010 NOD stated that additional detail will be added to the Work Plan. Revise the Work Plan to specify the QA/QC details.

**6. Section 4.5, Investigation-Derived Waste Plan**

**Permittee's Statement:** "All wastes generated during implementation of this work plan shall be handled and disposed of according to the requirements as presented in the Environmental Restoration Program Investigation Derived Waste Management Plan, 2009."

**NMED's Comment:** This section is unchanged from the previous revision of the Work Plan. Comment 43 of the 2010 NOD stated in part, "[t]his section does not provide a discussion on the procedures for management of investigation-derived wastes and anticipated waste streams..." Revise the Work Plan to specify the procedures for management of investigation-derived wastes and anticipated waste streams.

## 7. Appendix I, Figures

**NMED's Comment:** The figures presented in Appendix I were not included in the hard copy of the Work Plan. Many of the figures in Appendix I have symbols and legends that are not readable in the electronic format. Include legible paper and electronic versions of all figures, which must be in the main body of the Work Plan.

## 8. Figure 3-3, EOD Hill Craters

**NMED's Comment:** Figure 3-3 shows the location of either eight or 16 craters, as the symbol used is unclear. Section 3.1.6 states that 12 shallow craters are located in the limestone outcrops on top of EOD Hill. Revise the figure to clearly show all craters on EOD Hill, as well as sampling locations within each crater.

As stated in the letter titled, "*Approval With Modifications, CG570 Explosive Ordnance Disposal Hill Supplemental Site Investigation Report – Final, February 2015*", dated May 20, 2015, NMED will make a determination of the next step for monitoring well installation after reviewing the results of the acquisition of groundwater data and, if applicable, the extended purge sampling event. Surface soil sampling in the craters can move forward as proposed as soon as the Work Plan is approved.

The Permittee must submit a revised Work Plan that corrects all of the deficiencies noted in this Disapproval must be submitted no later than **July 31, 2015**. The revised Work Plan must be accompanied by a response letter that details where the Disapproval comments were addressed that cross-references NMED's numbered comments. The Permittee must also submit an electronic redline-strikeout version of the Report that shows where all changes were made to the Work Plan.

Col. Miller and Mr. Pike  
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If you have any questions regarding this matter, please contact Naomi Davidson of my staff at (505) 476-6022.

Sincerely,



John E. Kieling  
Chief  
Hazardous Waste Bureau

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File: KAFB 2015 and Reading, EOD Hill