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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

September 23, 2015

Eric H. Froehlich, Colonel  
Base Commander  
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2000 Wyoming Blvd SE  
Kirtland AFB, NM 87117-5606

John Pike  
Director, Environmental Management Services  
377 MSG  
2000 Wyoming Blvd SE  
Kirtland AFB, NM 87117-5270

**RE: LONG-TERM GROUNDWATER MONITORING SUMMARY REPORT FOR  
SOLID WASTE MANAGEMENT UNIT (SWMU) WP-26 SEWAGE LAGOONS  
AND GOLF COURSE MAIN POND, FEBRUARY 2015  
KIRTLAND AIR FORCE BASE, NEW MEXICO  
EPA ID # NM9570024423  
HWB-KAFB-15-008**

Dear Colonel Froehlich and Mr. Pike:

The New Mexico Environment Department (NMED) received the U.S. Air Force (Permittee) Kirtland Air Force Base's (Facility) *Long-Term Groundwater Monitoring Summary Report for Solid Waste Management Unit (SWMU) WP-26 Sewage Lagoons and Golf Course Main Pond* (Report), dated February 2015. NMED has reviewed the Report and hereby issues this Disapproval with the following comments.

**1. Section 2.1, Introduction, and Section 2.2, KAFB-0609 Well Abandonment**

**NMED's Comment:** Monitoring well KAFB-0609 was plugged and abandoned in June 2014, and KAFB-0610 was deemed unsafe to sample due to the condition of the pitless adaptor. Provide a proposed timeline in Section 3, Conclusions and Recommendations, for the replacement of KAFB-0609 and for the pump replacement in KAFB-0610.



**2. Figure 2-1, Groundwater Elevation Map, Sewage Lagoons Regional Aquifer March 2014**

**NMED's Comment:** Remove the KAFB-2630 label from the figure as it is not a regional groundwater monitoring well.

**3. Conclusions and Recommendations**

**Permittee's Statement:** "In addition, it is recommended that the two Golf Course extraction wells with pitless adaptors (KAFB-1062 and KAFB-10610) be re-equipped for sampling with either portable or nonportable Bennett pumps as part of the WP-26 monitoring program."

**NMED's Comment:** KAFB-1062 and KAFB-10610 are part of the monitoring network of SWMUs ST-106 and SS-111, not SWMU WP-26. Revise the statement accordingly.

**4. Figures**

**NMED's Comment:** The Permittee did not provide figures depicting TCE or nitrate concentrations. Add four figures that display TCE and nitrate concentrations for all groundwater monitoring wells during the November 2013 and March 2014 sampling events in order to depict the spatial variability of these constituents.

**5. Appendix C**

**NMED's Comment:** Many qualifiers in the analytical results table of Appendix C are undefined, including M, Q, Z-01, L, T, X, J+. Provide footnotes that define all qualifiers found in the table.

**6. Appendices**

**NMED's Comment:** Laboratory reports for all groundwater samples were not provided in the Report. Revise the Report to include the laboratory reports for all groundwater samples in an appendix.

Well logs and well construction diagrams were not provided in the Report. Revise the Report to include an appendix that provides the well logs and well construction diagrams for all wells associated with this site.

Previous water level and concentration data were not provided in the Report. Revise the Report to provide (at a minimum) the past three years of water level and concentration data for groundwater contaminants for all monitoring wells in an appendix.

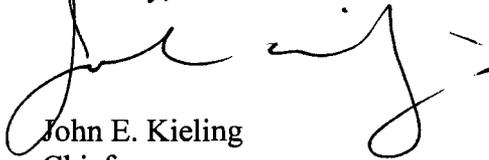
A revised Report that corrects all of the deficiencies noted in this letter must be submitted to NMED no later than **December 18, 2015**. The revised Report must be accompanied by a response letter that details where the NMED's comments were addressed and cross-references

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the numbered comments. In addition, the Permittee must submit an electronic redline-strikeout version of the revised Report that shows where all changes were made to the Report.

If you have any questions regarding this matter, please contact Naomi Davidson of my staff at (505) 222-9504.

Sincerely,



John E. Kieling  
Chief  
Hazardous Waste Bureau

cc: N. Davidson, NMED HWB  
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File: KAFB 2015 and Reading, WP-026