



SUSANA MARTINEZ  
Governor  
JOHN A. SANCHEZ  
Lieutenant Governor

NEW MEXICO  
ENVIRONMENT DEPARTMENT



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

RYAN FLYNN  
Cabinet Secretary  
BUTCH TONGATE  
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 23, 2015

Eric H. Froehlich, Colonel  
Base Commander  
377 ABW/CC  
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: FINAL LONG-TERM MONITORING PLAN - WP-026 BASE SEWAGE LAGOONS AND GOLF COURSE MAIN POND (SWMU WP-26), SEPTEMBER 2014 KIRTLAND AIR FORCE BASE, NEW MEXICO EPA ID # NM9570024423 HWB-KAFB-15-003**

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) *Final Long-Term Monitoring Plan - WP-026 Base Sewage Lagoons And Golf Course Main Pond (SWMU WP-26)* (Plan), dated September 2014. NMED has reviewed the Plan and hereby issues this Disapproval with the following comments:

**1. Section 3.1, Groundwater Monitoring Requirements**

**Permittee's Statement:** "Groundwater sampling and analysis will be conducted annually for the suite of analyses provided in Table 1. The locations of the monitoring wells are shown in Figure 2. Water level measurements will be taken prior to well purging and sample collection during each sampling event."

**NMED's Comment:** Water level measurements must be obtained quarterly rather than annually. Revise the Plan accordingly.



**2. Section 3.1, Groundwater Monitoring Requirements**

**Permittee's Statement:** "Sample handling, analyses, and QA/QC procedures will comply with the requirements defined in the *Final Uniform Federal Policy Quality Assurance Project Plan, WP-026 – Base Sewage Lagoons and Golf Course Pond (SWMU WP-26)* (USAF, 2014), as well as the sampling requirements outlined in the *Hazardous Waste Treatment Facility Operating Permit, EPA ID No. NM9570024423* (NMED, 2010)."

**NMED's Comment:** Detailed site-specific descriptions of groundwater level measurement methods, sample collection methods, QA/QC procedures, and equipment decontamination must be included in the Plan rather than references to Standard Operating Procedures. Revise the Plan accordingly.

**3. Section 3.1, Groundwater Monitoring Requirements**

**NMED's Comment:** The regional aquifer well KAFB-2628 has analyses proposed, including perchlorate and radioactive constituents, in addition to those analyses proposed for the other regional aquifer wells. Provide an explanation in the text for the additional analyses proposed for regional aquifer well KAFB-2628.

**4. Table 1, Groundwater Sample Analysis and Methods**

**NMED's Comment:** Table 1 shows that all wells include ammonia in the list of analytes with the exception of the Golf Course Pond Perched Aquifer Wells. Ammonia must be included to identify the different components of total nitrogen in groundwater. Add ammonia to the list of analytes for the Golf Course Pond Perched Aquifer Wells.

**5. Table 2, WP-026 Groundwater Monitoring Wells**

**NMED's Comment:** It appears that a typo exists in Table 2 in the screen slot size column. Add a decimal point after the first "0" of the screen slot size for well KAFB-2624.

**6. Table 2, WP-026 Groundwater Monitoring Wells**

**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 for the replacement of KAFB-0609 and for the pump replacement in KAFB-0610.

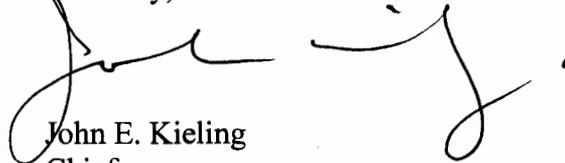
**7. Table 2, WP-026 Groundwater Monitoring Wells**

**NMED's Comment:** Well logs and well construction diagrams were not provided in the Plan. Logs and well construction diagrams for all wells associated with this site must be provided in an appendix of the Plan. Revise the Plan to include the appendix.

A revised Plan that corrects all of the deficiencies noted in this letter must be submitted to NMED no later than **December 18, 2015**. The revised Plan must be accompanied by a response letter that details where the NMED's comments were addressed and cross-references the numbered comments. In addition, the Permittee must submit an electronic redline-strikeout version of the revised Plan that shows where all changes were made to the Plan.

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  
W. Moats, NMED HWB  
W. McDonald, NMED HWB  
B. Wear, NMED HWB  
D. Cobrain, NMED HWB  
L. King, EPA 6PD-N  
C. Crossgrove, KAFB

File: KAFB 2015 and Reading, WP-026