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RYAN FLYNN  
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BUTCH TONGATE  
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 27, 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: DISAPPROVAL  
FINAL WP-026 – BASE SEWAGE LAGOONS AND GOLF COURSE POND  
(SWMU WP-26) INTERIM MEASURES WORK PLAN, SEPTEMBER 2014  
KIRTLAND AIR FORCE BASE, NEW MEXICO  
EPA ID # NM9570024423  
HWB-KAFB-15-002**

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 WP-026 – Base Sewage Lagoons and Golf Course Pond (SWMU WP-26) Interim Measures Work Plan* (Work Plan), on February 26, 2015. NMED has reviewed the Work Plan and hereby issues this Disapproval with the following comments:

**1. Section 3.3, Recommendations**

**Permittee’s Statement:** “The Corrective Measures Study Report for Solid Waste Management Unit WP-26, Sewage Lagoons and Golf Course Main Pond (USAF, 2010) was developed and evaluated the corrective action alternatives and recommended the corrective measure to be taken for the Site.”

**NMED’s Comment:** The Corrective Measures Study Report was submitted prematurely as the RFI has not yet been approved. As stated in NMED’s September 24, 2015 letter concerning the *2011 Resource Conservation and Recovery Act Facility Investigation Report For Groundwater Beneath Solid Waste Management Unit WP-26, Sewage*

KAFB4367



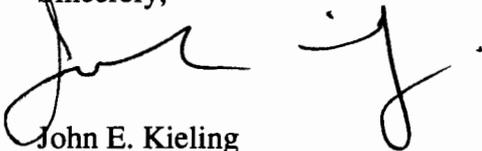
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*Lagoons*, the proposed corrective measure, soil vapor extraction, is not appropriate to remediate TCE from groundwater and further study of the site is required. The Permittee must propose an interim measure that is appropriate to remediate TCE in groundwater.

A revised Work Plan that addresses the deficiency noted in this letter must be submitted to NMED no later than **January 31, 2016**.

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