



SUSANA MARTINEZ  
Governor  
JOHN A. SANCHEZ  
Lieutenant Governor

NEW MEXICO **ENTERED**  
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**

March 22, 2016

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 LONG-TERM MONITORING PLAN - WP-026 BASE SEWAGE  
LAGOONS AND GOLF COURSE MAIN POND (SWMU WP-26),  
DECEMBER 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) revised *Final Long-Term Monitoring Plan - WP-026 Base Sewage Lagoons and Golf Course Main Pond (SWMU WP-26)* (Plan), dated December 2014, on January 25, 2016. NMED has reviewed the Plan and hereby issues this Disapproval with the following comments:

**1. Section 3.1 Groundwater Monitoring Requirements, p. 7**

**Permittee's Statement:** "Regarding monitoring at the Golf Course Main Pond, the *Corrective Measures Study Report for Solid Waste Management Unit WP-26, Sewage Lagoons and Golf Course Main Pond* (USAF, 2010b), it is recommended that monitoring of the wells associated with the pond be continued under the ST-105 Nitrate Abatement Plan. Upon agreement with the NMED, monitoring of the wells associated with the pond will no longer be conducted and reported under WP-026, but will be continued under the ST-105 project."



**NMED's Comment:** The wells associated with the golf course pond have historically been included in both the Stage 2 Abatement Plan monitoring reports and the WP-26 monitoring reports. There is no precedent and no benefit to modifying the permit to split the golf course pond and sewage lagoons into different SWMUs, as both sites still require corrective action to remediate contaminated groundwater. The golf course pond wells KAFB-0608 and KAFB-0610 must continue to be reported under SWMU WP-26. Monitoring well KAFB-0602 must be added to future SMWU WP-26 monitoring reports since well KAFB-0609 has been plugged and abandoned. The Permittee also should revise the Stage 2 Abatement Plan under the Ground Water Quality Bureau as actions for the Bulk Fuels Facility Spill have significantly altered the nitrate abatement plan.

**2. Section 3.2, Soil Vapor Extraction System Monitoring, p. 7**

**Permittee's Statement:** "Monthly samples from the three monitoring ports will undergo VOC analysis using a photoionization detector (PID) and fixed gases using and air monitoring meter in accordance with SOP-46 provided in Appendix A of the project QAPP."

**and**

"The soil vapor samples will undergo monthly analysis for VOCs and fixed gases using the PID and air monitoring meter with quarterly sampling [sic] be collected and submitted for off-site laboratory analysis of VOCs and fixed gases as per SOP-33 "Organic Vapor Measurement" provided in Appendix A of the project QAPP."

**NMED's Comment:** Detailed site-specific descriptions of soil vapor sampling methods using the PID and air monitoring meter, as well as soil vapor sampling methods for off-site laboratory analysis, must be included in the Plan rather than references to Standard Operating Procedures. Revise the Plan accordingly.

**3. Figure 2, WP-026 Monitoring Well Locations, p. 8**

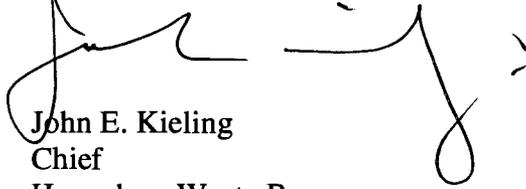
**NMED's Comment:** KAFB-2624 does not appear to be properly located on Figure 2, WP-026 Monitoring Well Locations. Also, perched monitoring wells KAFB-2623, KAFB-2627, KAFB-2602A, and regional monitoring wells KAFB-0504, KAFB-0507, KAFB-0512, and KAFB-0522 are not mentioned in the Plan. Add these wells to Table 2, WP-026 Groundwater Monitoring Wells, Figure 2, Appendix A, and elsewhere as appropriate in the Plan, or explain why these wells are no longer appropriate for inclusion for groundwater sampling and water level measurements for this site.

A revised Plan that corrects all of the deficiencies noted in this letter must be submitted to NMED no later than **May 31, 2016**. The revised Plan must be accompanied by a response letter that details where the NMED's comments were addressed that cross-references the numbered comments. In additions, provide a redline-strikeout version of the revised Plan that highlights where all changes have been made to the Plan.

Col. Froehlich and Mr. Pike  
March 22, 2016  
Page 3

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

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kieling". The signature is fluid and cursive, with a large initial "J" and a long horizontal stroke.

John E. Kieling  
Chief  
Hazardous Waste Bureau

cc: N. Davidson, NMED HWB  
B. Wear, NMED HWB  
D. Cobrain, NMED HWB  
L. King, EPA 6PD-N  
C. Crosgrove, KAFB

File: KAFB 2016 and Reading, KAFB-15-003