



DEPARTMENT OF THE AIR FORCE
377TH AIR BASE WING (AFGSC)

ENTERED



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JAN 15 2016

Mr. John Kieling, Manager
Hazardous Waste Bureau (HWB)
New Mexico Environment Department (NMED)
2905 Rodeo Park Road
Santa Fe NM 87505

Dear Mr. Kieling

Kirtland Air Force Base (KAFB) recently received multiple Notices of Disapproval (NMED): 23 September 2015, HWB-KAFB-15-008; 23 September 2015, HWB-KAFB-10-026; and 25 September 2015, HWB-KAFB-12-007) regarding submittals for Solid Waste Management Unit (SWMU) WP-026.

These reports receiving the Notices of Disapproval were submitted to NMED during calendar years 2010 through 2015 and disapprovals were received by KAFB in letters dated September 2015. Unfortunately, these reports were generated by previous contractors no longer under contract to conduct work or generate any documents regarding WP-026. Due to the expiration of the previous contracts, coupled with extended review times, we will be unable to directly address comments on these reports. However, the Air Force will ensure that all future annual reports of this nature address the comments that were received recently from NMED.

For all of the listed documents, comments have been addressed and can be found in the comment/response worksheet attached to this letter.

Please contact Mr. Wayne Bitner at (505) 853-3484 or at ludie.bitner@us.af.mil or Mr. Scott Clark at (505) 846-9017 or at scott.clark@us.af.mil, if you have any questions or concerns.

Sincerely

ERIC H. FROEHLICH, Colonel, USAF
Commander

Attachment:
Comment/Response Worksheet-WP-026 Master

cc:
NMED-EHD (Roberts)
NMED-HWB (Cobrain w/o atch, Davidson with atch)
AFCEC-CZR (Bodour, Renaghan)
Public Info Repository (Central New Mexico Community College),
Administrative Record/Information Repository (AR/IR), and File



Common Comment and Response Worksheet (Version 3)

DATE		REVIEWER		DOCUMENT TITLE (version)	CONTRACT/TO NUMBER
23-Sep-15		NMED		Long-Term Groundwater Monitoring Summary Report for Solid Waste Management Unit (SWMU) WP-26 Sewage Lagoons and Golf Course Main Pond, February 2015 - HWB-KAFB-15-008	Previous contractor
Item	Source	Section	Page	NMED Comment	FPM/AECOM Response
1	NMED	2.1		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.	Well KAFB-0610 has been repaired and was subsequently sampled during the FY 2015 monitoring event. As noted, KAFB-0609 was abandoned. Another perched well is located in the vicinity of KAFB-0609, which would serve as a substitute for KAFB-0609. Well KAFB-0602 is located approximately 600 ft from the former location of KAFB-0609 and used to be sampled in support of the characterization of WP-026.
2	NMED	Figure 2-1		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.	This well will not be included in future monitoring reports.
3	NMED			Conclusions and Recommendations - Permittees 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.	This report was submitted by a previous contractor who is no longer under contract to AFCEC. Future reports will not contain this statement.
4	NMED	Figures		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 spacial variability of these constituents.	Future monitoring reports will present appropriate figures. To note, TCE is the primary constituent of concern impacting the perched groundwater underlying the sewage lagoons. The nitrate is being addressed under site ST-105 and detailed discussion of the nitrate impacts to groundwater will be presented in annual reports prepared for that site.
5	NMED	Appendix C		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 the qualifiers found in the table.	Future monitoring reports will provide appropriate definitions of terms presented in the analytical tables.
6	NMED	Appendices		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	Future monitoring reports will provide analytical data reports on a compact disc as an appendix to the reports. The well completion diagrams and available borehole logs have been provided in the most recent long-term monitoring plan.

DATE		REVIEWER		DOCUMENT TITLE (version)	CONTRACT/TO NUMBER
23-Sep-15		NMED		Corrective Measures Study Report for Solid Waste Management Unit WP-26, Sewage Lagoons and Golf Course Main Pond, August 2010 - HWB-KAFB-10-026	Previous contractor
Item	Source	Section	Page	NMED Comment	FPM/AECOM Response
1	NMED	2.2	2-1, 2-2	A letter was issued by NMED that rejects the Corrective Measures Study (CMS) Report: The document was rejected by NMED for two main reasons: 1) that the CMS was submitted prematurely prior to the approval of the RCRA Facility Investigation (RFI); and 2) that more site characterization information is required to complete the RFI before a corrective measures evaluation can be completed. Regarding the latter, NMED states that perched aquifer characterization information needs to be mapped and submitted, and that a constant discharge field aquifer test must be conducted to evaluate perched aquifer properties. NMED states that this requirement was first described in NMED's letter, <i>Disapproval, 2011 Resource Conservation and Recovery Act Facility Investigation Report for Groundwater Beneath Solid Waste Management Unit WP-26, Sewage Lagoons</i> , dated August 31, 2015.	This report was submitted by a previous contractor. Subsequent to submittal and review of the report, an Interim measures work plan has been submitted to NMED for review. Revision of the interim measures work plan will provide for soil vapor extraction to treat the residual volatile organic compound contamination in the vadose zone and spot treatment of the impacted perched aquifer groundwater using air sparge to address the trichloroethene in the groundwater. To note, the trichloroethene concentration was 15 ug/L during the most current sampling event and should continue to decline fairly rapidly once the new treatment system is installed. The trichloroethene concentration in the other perched groundwater monitoring wells in the area is less than 5 ug/L. Through implementation of soil vapor extraction to remove the remaining source material in the vadose zone that is impacting the groundwater and spot treatment of the groundwater in the vicinity of the one well exceeding the regulatory level, remediation of the site will be achieved.

DATE		REVIEWER		DOCUMENT TITLE (version)	CONTRACT/TO NUMBER
25-Sep-15		NMED		2011 Resource Conservation and Recovery Act Facility Investigation Report for Groundwater Beneath Solid Waste Management Unit WP-26, Sewage Lagoons, April 2012 - HWB-KAFB-12-007	Previous contractor
Item	Source	Section	Page	NMED Comment	FPM/AECOM Response
1	NMED	2.2.4.3		Geophysical logs (dual induction, gamma ray, and neutron logs) for monitoring wells KAFB-2630, KAFB-0506, KAFB-0505, KAFB-0507, KAFB-0512, KAFB-0522, and KAFB-0525 were not provided in Appendix C. If geophysical logs exist for these wells, include them in the appendix; otherwise, provide an explanation why geophysical logs were not recorded for each well where logs were not obtained.	Available logs have been provided in the most recent long-term monitoring plan.
2	NMED	Figure 2-9		Provide a description in the text of how the top of the clay layer was located in each perched aquifer monitoring well (e.g., use of lithologic logs, geophysical logs, etc.). Provide a table that includes the depths and elevations for top of screen, bottom of screen, depth to water, and top of confining clay layer for each perched aquifer well associated with the former sewage lagoons.	The interim measures work plan that had previous been submitted by URS to NMED for review and is being revised will present the lithologic data for each well for which boring data were available. In addition, well completion diagrams are provided in the most recent long-term monitoring plan along with the available boring logs. A table providing the well completion information is also given in the monitoring plan.
3	NMED	4.2		The corrective measures proposed in the cited report have not been approved by NMED; the report is addressed in other NMED correspondence to the Permittee. Also, the first paragraph of Section 2.6.5, Nature and Extent of Contamination, states "VOCs are present in soil vapor and perched groundwater beneath the former sewage lagoons, are the most mobile form of contamination, and the only form likely to present human health or ecological concerns at the site." The proposed corrective measure, soil vapor extraction, is not appropriate to remediate TCE in groundwater. Prior to determining whether or not enhanced reductive dechlorination treatment, groundwater extraction with ex-situ treatment, or dual phase SVE is feasible, the Permittee must determine the hydraulic properties of the perched aquifer. Therefore, the Permittee must propose a constant discharge aquifer test in order to determine the perched aquifer's hydrologic characteristics prior to evaluating potential remedies.	This report was submitted by a previous contractor. Subsequent to submittal and review of the report, an interim measures work plan has been submitted to NMED for review. Revision of the interim measures work plan will provide for soil vapor extraction to treat the residual volatile organic compound contamination in the vadose zone and spot treatment of the impacted perched aquifer groundwater using air sparge to address the trichloroethene in the groundwater. To note, the trichloroethene concentration was 15 ug/L during the most current sampling event and should continue to decline fairly rapidly once the new treatment system is installed. The trichloroethene concentration in the other perched groundwater monitoring wells in the area is less than 5 ug/L. Through implementation of soil vapor extraction to remove the remaining source material in the vadose zone that is impacting the groundwater and spot treatment of the groundwater in the vicinity of the one well exceeding the regulatory level, remediation of the site will be achieved. Should the employed approach fail to adequately address the TCE, additional tests and resulting methodologies will be proposed.