



SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

NEW MEXICO  **ENTERED**
ENVIRONMENT DEPARTMENT

Ground Water Quality Bureau
1190 South St. Francis Drive (87505)
P.O. Box 5469, Santa Fe, New Mexico 87502-5469
Phone (505) 827-2900 Fax (505) 827-2965
www.env.nm.gov



BUTCH TONGATE
Cabinet Secretary

J.C. BORREGO
Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

June 2, 2017

Colonel Eric H. Froehlich
377 ABW/CC
2000 Wyoming Blvd SE
Kirtland AFB, NM 87117-5000

RE: Corrective Action Report Disapproval and Requirement to Submit a Modified Corrective Action Report for Nitrate Release at Kirtland Air Force Base, New Mexico

Dear Col. Froehlich:

The New Mexico Environment Department (NMED) hereby disapproves the corrective action report (CAR) dated April 10, 2017. The release location is a manhole located on Kirtland Air Force Base (KAFB) along Randolph Road. The report addresses observed increasing nitrate concentrations over time at three groundwater monitoring wells associated with the Bulk Fuels Facility (BFF) and a manhole (MH-13) that is in disrepair. The report is disapproved because additional work was not proposed to determine extent of impacts to groundwater quality and no actions were proposed related to the known impacts to the groundwater (e.g., monitored natural attenuation). A modified CAR is required pursuant to Section 1203.A of the New Mexico Ground and Surface Water Regulations (20.6.2 NMAC).

The CAR identified increasing nitrate concentrations in three groundwater monitoring wells associated with the Bulk Fuels Facility (BFF) groundwater monitoring program: KAFB-106005, KAFB-106009, and KAFB-106012R. Nitrate concentrations exceed the New Mexico Water Quality Control Commission standard of 10 milligrams per liter (mg/L) for nitrate; KAFB reported a nitrate concentration of 19.9 mg/L in Fourth Quarter 2016. Increasing concentration trends for chloride, sulfate, sodium, and potassium were also observed in the three wells. Upon investigation, KAFB found that manhole-13 (MH-13) had been compromised with tree roots invading the bottom of the manhole structure, resulting in leakage of sewer water into the subsurface.

The corrective action, as stated in Section 2 of the CAR, is to remove and replace MH-13, along with 10-20 feet of connecting pipe. This action will remove the ongoing source of nitrate in

KAFB4555



Colonel Eric Froehlich

June 2, 2017

Page 2 of 2

groundwater. There is no proposed action or recommendation to address the nitrate, sulfate, and chloride concentrations in groundwater that exceed their respective New Mexico water quality standards (20.6.2.3103 NMAC). Please submit a modified CAR work plan to NMED within 60 days of receipt of this letter. At a minimum, the modified CAR should include sampling of groundwater at the site and the proposed actions to address groundwater impacted by the sewage water release.

NMED encourages KAFB to consult with NMED staff during the preparation of the modified CAR. Please contact Diane Agnew, Project Manager at (505) 222-9555, or Justin Ball, State Cleanup Team Leader, at (505) 222-9522. Thank you for your cooperation in this matter.

Sincerely,

Handwritten signature of Ali Furmall in cursive script.

Michelle Hunter, Chief
Ground Water Quality Bureau

cc: Col. Harner, Kirtland Air Force Base, 377 ABW/CC, 2000 Wyoming Blvd SE, Kirtland AFB, NM 87117-5000
Kate Lynnes, Kirtland Air Force Base, kathryn.lynnes@us.af.mil
Adria Bodour, Kirtland Air Force Base -Air Force Civil Engineer Center, adria.bodour.1@us.af.mil
Trent Simpler, U.S. Army Corps of Engineers, Trent.Simpler@usace.army.mil
Bart Faris, Albuquerque Environmental Health Department, bfaris@cabq.gov
Rick Shean, Albuquerque Bernalillo County Water Utility Authority, flshean@abcwua.org
John Kieling, Chief, NMED-HWB
Diane Agnew, Project Manager, ROS-SCP
Justin Ball, Team Leader, ROS-SCP
Ali Furmall, Program Manager, ROS
ROS Reading File