

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



Colonel Richard W. Gibbs 377th Air Base Wing 2000 Wyoming Blvd SE Kirtland AFB NM 87117

Mr. John Kieling, Bureau Chief Hazardous Waste Bureau (HWB) New Mexico Environment Department (NMED) 2905 Rodeo Park Drive East, Building 1 Santa Fe NM 87505-6303



DEC 1 5 2017

Dear Mr. Kieling

The Air Force (AF) is submitting this extension request for your consideration and in response to the New Mexico Environment Department's (NMED's) Notice of Deficiency (NOD) letter dated 16 November 2017. This extension request is submitted in accordance with the agreements made at the 7 December 2017 meeting held at the NMED office in Santa Fe. Accordingly, the AF is requesting an extension for submittal of the work plan for the drilling and installation of the new water table groundwater monitoring wells and a modification to the Quality Assurance Project Plan (QAPP) for groundwater monitoring.

The AF is respectfully requesting an extension from the date contained in the NOD for the work plan and QAPP to 5 January 2018. The QAPP will not contain vadose zone sampling, but will contain information on the new monitoring wells. The AF could not submit the previously approved Rev. 1 QAPP as requested by NMED in an 11 December 2017 meeting because of numerous changes including, but not limited to, screening levels and laboratory certifications. The revised QAPP will be attached as Appendix to the referenced work plan. The AF acknowledges that NMED requested a standalone QAPP and due to AF resource constraints, NMED afforded the AF the opportunity to submit the QAPP within the current framework with the understanding that the AF is diligently working to meet the intent of the standalone request for future submittals.

In reference to the NOD letter dated 16 November 2017, NMED has requested that the United States Geological Survey (USGS) quarterly data be added to the Bulk Fuels Facility (BFF) quarterly reports. The AF recognizes the importance of incorporating USGS data into the BFF quarterly reports for continued confidence in the Albuquerque Bernalillo County Water Utility Authority water supply wells. The AF will include the USGS data in the BFF quarterly reports beginning with quarter four of the current reporting cycle as an appendix to the report.

The AF acknowledges NMED's preference for continuing to pump well KAFB-106233 whenever possible during the current upgrade to the groundwater treatment plant and future planned shutdowns.

The AF will be submitting the revised work plan for continuous coring by the 15 December 2017 suspense contained in the NOD. The AF will also be submitting a separate extension request to the 31 December 2017 suspense date for the six-step capture zone analysis and modeling for NMED's

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consideration and as agreed upon by both parties. This extension request will be submitted prior to the suspense date.

At this time the AF is unable to provide firm schedules for contract modifications or new contract awards; however, the standard turnaround time for execution of a contract modification is 90 days and for a new contract award is 120 days. The AF is committed to complying with the Kirtland Air Force Base's Resource Conservation and Recovery Act Permit and appreciates NMEDs understanding and willingness to help achieve this goal.

If you have any questions or concerns, please contact Mr. Christopher Segura at (505) 853-5443 or at christopher.segura.2@us.af.mil or Mr. Scott Clark at (505) 846-9017 or at scott.clark@us.af.mil.

Sincerely

RICHARD W. GIBBS, Colonel, USAF

Commander

cc:

NMED (Borrego) letter
NMED GWQB (Agnew, Hunter), letter and CD
EPA Region 6 (King, Ellinger), letter and CD
COA (Faris), letter and CD
ABCWUA (Shean), letter and CD
SAF-IEE (Lynnes), electronic only
AFCEC/CZ (Bilbrey,Segura, Renaghan, Clark, O'Grady), electronic only
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