



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
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*Transmitted via e-mail*

March 3, 2015

**MEMORANDUM**

**FROM:** *Laurie King*  
Section Chief  
Federal Facilities Section (6PD-F)

**TO:** Dennis McQuillan  
Geologist  
New Mexico Environment Department

**RE:** **EDB Interim Measure Implementation Plan, Bulk Fuels Facility Spill, Solid Waste Management Units ST-106 and SS-111, Kirtland Air Force Base, Albuquerque, New Mexico, February 26, 2015**

The United States Environmental Protection Agency (EPA) has reviewed the above referenced report that was sent by the New Mexico Environment Department (NMED) via email to the EPA on February 27, 2015. As requested by the NMED, the EPA provides the following comments.

**Interim Measure Implementation Schedule**

1. Suggest adding permit timelines to the schedule, i.e. changing water rights, right of entry, discharge, etc.

**Aquifer Pilot Test Work Plan**

2. According to the August 1, 2014 Groundwater Extraction Pilot Implementation and Additional Plume Characterization Work Plan – Revision 1, extraction well KAFB-106228 will be screened to extract water from the shallow, intermediate, and deep zones of the aquifer. The EDB Interim Measure Implementation Plan states on page 2-2 “for the step-drawdown test, the pump will be placed at the center of the submerged well screen”. The EPA’s Suggested Operating Procedures for Aquifer Pumping Tests recommends that observation wells should penetrate the tested aquifer to the same stratigraphic horizon as the well screen of the pumping well. Please clarify where KAFB-106228 will be screened, where the pump will be placed in the extraction well, and how the observation wells screened in varying zones will be used to determine aquifer response.
3. Please review EPA comments on the January 2014 Aquifer Testing Results to ensure that the discrepancies and issues noted are not repeated with the next aquifer test.

**Other Actions to Collapse EDB Plume**

4. No comments

If you have any questions concerning these comments, please contact Paul Torcoletti at 214-665-6494 or at [torcoletti.paul@epa.gov](mailto:torcoletti.paul@epa.gov) or Tara Hubner at 214-665-7246 or at [hubner.tara@epa.gov](mailto:hubner.tara@epa.gov).

