

June 26, 2019

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Honorable John W. Henderson, P.E.
Assistant Secretary of the Air Force for Installation, Environment, and Energy
1665 Air Force Pentagon
Washington, DC 20330-1665

Re: Follow-up Questions Regarding the April 17, 2019 Air Force Project Update on the Kirtland Air Force Base Bulk Fuels Facility Jet Fuel Leak Provided to the Albuquerque Bernalillo County Water Utility Authority Board

Dear Secretary Henderson:

On April 17, 2019, Mr. Mark Correll made a presentation to the Albuquerque Bernalillo County Water Utility Authority (Water Authority) regarding the Kirtland Air Force Base (KAFB) Bulk Fuels Facility (BFF) jet fuel leak project. The Water Authority Board appreciates the time and resources the Air Force invested for Mr. Correll to travel to New Mexico provide a status report.

As was stated in the meeting, we are thankful for the hard work and the progress described in Mr. Correll's presentation and we appreciate the opportunity to continue to work with the Air Force on this vital remediation project. We requested the opportunity to follow up with questions or concerns and this letter was prepared to discuss those including the project timeline, budget and cleanup methodology. We look forward to receiving a detailed response from your office.

Timeline

One of the most pressing concerns is the apparent slowdown of progress at the cleanup site. Our understanding from Mr. Correll's remarks and from Air Force comments at stakeholder meetings is that no additional remediation efforts at the site will be considered until after completion of the Corrective Measures Evaluation (CME). Per the timeline presented, the CME process, which itself may take several years, will not even begin until 2023. This delay, in combination with the discontinuation of interim measures and with Air Force reluctance to improve the existing pump-and-treat system, calls into question the Air Force's commitment to adequately mitigate the groundwater contamination caused by the leak.

Previously, the Air Force provided stakeholders with project schedules and timelines to assist with tracking the various work plans, field operations, and reports that are part of corrective actions at the BFF site. The project schedules were very informative and we would like to request that the Air Force consider resuming these schedules, along with planned work schedules, so that stakeholders can more easily track what is happening at the site.

Target Capture Zone

In addition to the timeline, we are also concerned about the Air Force's assertion that the current groundwater treatment interim measure has removed more than 80 percent of ethylene dibromide (EDB) from the "target capture zone." Our understanding is that the zone being described is limited to an area north of Ridgcrest Drive and excludes the large area closer to the contamination source. To minimize the future risk to nearby water supply wells, removal of EDB from all parts of the groundwater contamination plume is imperative.

KAFB4800



Secretary John W. Henderson, P.E.
Kirtland Air Force Base BFF
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Project Budget

Regarding the project budget, we were very concerned to learn that project funding for 2019 was reduced by almost half compared to the previous year. Based on an Air Force summary table breaking down funding by year for this project, the total budget for 2019 is \$1.3 million; in 2018 the budget was \$2.5 million. This is concerning considering that project requirements appear to be increasing and not decreasing. For example, there are now more groundwater wells to be monitored and sampled; the bioventing pilot test is now under way, with its requirements for equipment, monitoring, and analysis; and new soil vapor monitoring points are slated for installation and sampling in 2019. We would appreciate it if your office could provide a breakdown of the budget allocation for 2019 to include a description of what activities are included for this year and the next three years.

Operation of the Pump-and-Treat System

During the presentation, Mr. Correll mentioned that no changes are planned for the operation of the pump-and-treat system prior to the CME. However, during an April 24, 2019 technical working group meeting attended by Bernalillo County and Water Authority staff, Air Force representatives appeared to contradict this assertion by suggesting that they are considering operational changes. These include turning off certain wells, raising and lowering pumps, and reducing pumping rates at the extraction wells. In fact, it is our understanding that the Air Force changed the height of a pump in an extraction well without technical evaluation or written notification and approval by the NMED. Please clarify what the Air Force considers acceptable adjustments to the treatment system prior to the CME.

Source Area Treatment

Water Authority personnel participated in the numerous technical working group (TWG) meetings where the Air Force and other stakeholders specifically addressed the need to initiate an interim measure in the source area. The agreed-upon solution was an air-lift recirculation treatment system that would remediate remaining fuel on base and in portions of the groundwater. Although the work plan for this interim measure was approved by the NMED on April 6, 2018, it has not yet been constructed. In the April 24, 2019 TWG meeting, the Air Force's contractor stated that the well for this interim measure could not be installed because it had been relocated and built as a monitoring well. This movement and repurposing of the well was done without NMED review and concurrence and without communication to the TWG or stakeholders. The implementation of this necessary source area interim measure is now further delayed while a contract modification is completed and additional funding is secured. It is concerning that the Air Force is making these types of decisions without consultation with the NMED. Additionally, this is an example of the Air Force's decreasing engagement with the TWG and stakeholders.

Data Gaps in Plume Characterization

Data gaps at the KAFB BFF site have been a persistent issue due to the lack of groundwater monitoring wells to adequately characterize the contamination plumes. We understand, however, that the Air Force has added multiple groundwater monitoring wells and has implemented a new well design to ensure adequate data collection even as groundwater levels continue to rise. What is the Air Force's level of confidence that the EBD and BTEX (benzene, toluene, ethylbenzene, and xylene) plumes have been characterized? Additionally, what are the multiple lines of evidence being evaluated to provide that level of confidence and determine that the plumes have been sufficiently characterized?

The Air Force recently completed a substantial drilling effort to collect soil cores from the source area at the project site in order to address data gaps in our understanding of the remaining fuel in the ground. Our expectation based on a March 2018 briefing to our board was that information from the

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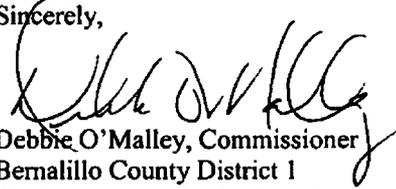
core sampling would be integrated into the Phase II site characterization report. At the May 30, 2019 stakeholder meeting, however, the Air Force indicated that the contract for the soil cores did not include analysis, an alarming omission from a contract for such a resource-intensive field effort. The Air Force indicated that they are working with the U.S. Army Corps of Engineers to add scope and funding to complete the core analysis. What is the Air Force's confidence that this delay in analyzing the cores will not negatively impact data quality? Please also explain how this delay impacts the overall timeline to initiate the CME and reach selection of the final remedy.

EDB Mass

At the conclusion of the April 17, 2019 presentation the Board asked if the Air Force had estimated the total mass of EDB in groundwater at the cleanup site. This number was not provided at the meeting and Mr. Correll stated that the Air Force would respond with the estimate later. Please provide this, along with an estimate of the mass of EDB removed to date compared to the total mass. In addition, the EDB plume reduction map presented appeared to show concentrations only of EDB above five parts per billion rather than whether EDB was present or not present. We would appreciate your clarification on this matter.

In thoroughly addressing the questions and concerns raised above, your office can make great strides in bolstering the Water Authority's confidence, and that of the community, in the Air Force's efforts at the BFF site. We look forward to hearing from you as we continue working together to protect drinking water resources for Albuquerque and Bernalillo County, and the servicemen, servicewomen, their families and veterans who call our community home.

Sincerely,


Debbie O'Malley, Commissioner
Bernalillo County District 1
Chair, Water Authority Board


Maggie Hart-Stebbins, Chair
Bernalillo County District 3
Member, Water Authority Board

C: Senator Tom Udall
United States Senate
531 Hart Senate Office Building
Washington, D.C. 20510

Senator Martin Heinrich
United States Senate
531 Hart Senate Office Building
Washington, D.C. 20510

Representative Debra Haaland
United States House of Representatives
1237 Longworth House Office Building
Washington, D.C. 20515

James Kenney, Cabinet Secretary, New Mexico Environment Department
Jennifer Pruet, Deputy Secretary, New Mexico Environment Department
Mark S. Sanchez, Executive Director, Water Authority
John M. Stomp III, P.E., Chief Operating Officer, Water Authority