



NEW MEXICO
ENVIRONMENT DEPARTMENT



Hazardous Waste Bureau

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Director
Environmental Health Division

MEMORANDUM

TO: Dave Cobrain, Manager, Permits Management Program

THROUGH: William Moats, Albuquerque Group Manager, Permits Management Program

FROM: William McDonald, Environmental Specialist, Hazardous Waste Bureau
Sid Brandwein, Environmental Specialist, Hazardous Waste Bureau

SUBJECT: **REVIEW OF KAFB'S RESPONSES TO UNOFFICAL NMED
COMMENTS FOR DRAFT REVISED AQUIFER TEST WORK PLAN,
SEPTEMBER, 2013, FOR THE KIRTLAND AIR FORCE BASE BULK
FUELS FACILITY SPILL**

DATE: **October 30, 2013**

We received from you via e-mail on October 22, 2103, Kirtland Air Force Base's (Permittee's) responses to NMED comments that have been unofficially provided to the Permittee by senior management concerning the draft plan entitled *Aquifer Testing Work Plan, Bulk Fuels Facility Spill, Solid Waste Management Unit SS-106 and SS-111*, dated September 2013, in redline/strikeout format. HWB staff also provided comments on an earlier draft of the plan in a September 10, 2013, memorandum to you in which 12 concerns were presented. It is not clear which of our concerns on the earlier draft were passed on to the Permittee, as Steve Reuter, PSTB/NMED, also reviewed the earlier plan, and he has reviewed at least one other version of the earlier plan that was not provided to HWB technical staff.

The subject responses reference text changes in yet another version of the plan that was not provided with the responses. Because the latest version of the draft plan was not provided, and HWB staff is not sure what comments have been passed on to the Permittee, it is not possible to conduct a full and appropriate review of the responses. Nonetheless, the responses indicate that the draft plan is apparently inadequate (see comment #1 below) and should not be approved by the NMED.

Our comments on the subject responses are as follows.

KAFB4839



1. There must be observable drawdown in the observation well(s) for the constant rate test to provide the necessary information to properly design a groundwater remediation system. For example, empirical data are needed to predict with more certainty the extent of capture zones. The responses do not commit to do whatever is necessary to obtain drawdown information at an observation well(s). For this reason alone, the plan should not be approved.
2. HWB staff cannot assess whether the treatment system is likely to work well enough to meet treatment goals, chiefly because a detailed design of the system has not been provided for HWB staff to review.
3. HWB staff cannot assess whether sampling and analysis of the treated groundwater is adequate for purposes of waste management and release of the treated groundwater into the environment. The discharge location has changed from the ABCQUA re-use system to a KAFB retention ponds. Details were not provided.
4. Because the new plan is not available, HWB staff cannot determine if deficiencies identified earlier by HWB, but not addressed by the responses, have been adequately corrected.