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



Colonel David S. Miller, USAF
Commander
377th Air Base Wing
2000 Wyoming Blvd SE
Kirtland AFB NM 87117

AUG 23 2019

Ms. Shelly Lemon
Surface Water Quality Bureau
New Mexico Environment Department (NMED)
1190 St. Francis Drive, Room N-2050
Santa Fe NM 87505

Dear Ms. Lemon

The United States Air Force (USAF) is in receipt of the State Certification for the proposed National Pollutant Discharge Elimination System (NPDES) Permit No. NM0031216 for Kirtland Air Force Base (AFB), New Mexico dated July 26, 2019. The Air Force concurs with Comments #1 and #2 under *Comments that are not Conditions of Certification*.

The USAF offers the following comments, specifically Comment #3 under *Comments that are not Conditions of Certification*:

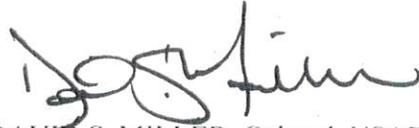
1. The New Mexico certification requirement for PFAS is outside the scope of the State Certification authority under 40 CFR § 124.53. PFAS is an unregulated contaminant for which there is currently no Federal standard. The USAF recognizes that New Mexico recently adopted perfluorooctane sulfonic acid (PFOS), perfluorooctanoic acid (PFOA) and perfluorohexanesulfonic acid (PFHxS) as a toxic pollutant pursuant to 20.6.2 NMAC Groundwater and Surface Water Protection Standards in December of 2018. However, pursuant to 40 CFR § 131.21 water quality standards must be approved by the EPA prior to their use in the NPDES permitting process. Accordingly, PFAS constituents should not be adopted as a NPDES permit requirement.
2. The groundwater that is source of the influent to the Bulk Fuels Facility Bulk Fuels Facility (BFF) Groundwater treatment plant is extracted from the regional aquifer off-base. The four extraction wells that contribute to the pump and treat system are located under residential and commercial neighborhoods and away from any possible sources of PFAS. In addition, the influent goes through two 20,000 pound granular activated carbon treatment vessels that operate in series that remove any volatile organic contaminants. Lastly, as detailed in the *Final Site Inspection Report for AFFF* [aqueous film forming foam] *Areas* dated September 2017, Kirtland AFB does not have a PFAS issue in groundwater.

KAFB4873



If you have any questions or concerns, please contact Mr. Scott Clark at (505) 846-9017 or at scott.clark@us.af.mil or Mr. Sheen Kottkamp at (505) 846-7674 or at sheen.kottkamp.1@us.af.mil.

Sincerely



DAVID S. MILLER, Colonel, USAF
Commander

Attachment:
2017 Kirtland AFB Site Inspection Report for AFFF Areas

cc:

EPA (Rosborough, Larson, Nguyen, Dwyer), letter
NMED (Kenney), letter
NMED-PSRS (Holcomb), letter
NMED-OOTS (McQuillan), letter
NMED-HWB (Kieling), letter
Pueblo of Isleta (Lucero), letter
SAF-IEE (Lynnes), electronic only
AFCEC/CZ (Renaghan, Segura, Fitzner), electronic only
USACE-ABQ District Office (Phaneuf, Dreeland, Kunkel, Sanchez, Salazar), electronic only
Public Info Repository, Administrative Record/Information Repository (AR/IR) and File



