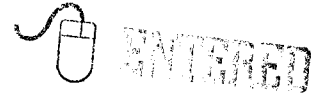




**DEPARTMENT OF THE AIR FORCE  
377TH AIR BASE WING (AFGSC)**



NOV 8 2019

Colonel Christopher J. King, USAF  
Vice Commander  
377th Air Base Wing  
2000 Wyoming Blvd SE  
Kirtland AFB NM 87117

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



Dear Mr. Kieling

The Air Force is in receipt of New Mexico Environment Department's (NMED) letter dated September 10, 2019 regarding site ST-070E. The Air Force has been monitoring groundwater at well KAFB-7001 since July 2002 as detailed in the annual reports submitted to NMED. The primary contaminant of concern in groundwater is trichloroethylene (TCE); and since 2014, there has only been one sampling event in which TCE was above the method detection limit (2.38  $\mu\text{g/L}$  measured on May 19, 2014, below the regulatory level of 5  $\mu\text{g/L}$ ). Since that sampling event, there have been eleven separate sampling events where TCE was not detected and three 'J flag' - i.e., estimated detections that were below the method detection limit. The depth to groundwater at ST-070E is approximately 450 ft. below ground surface, which is 300 ft. below the deepest detected soil contamination at the site based on deep soil sampling conducted during construction of new soil vapor wells.

The Air Force indicated in its August 23, 2019 letter the need to perform a Critical Process Analysis (CPA) to evaluate the technical merits regarding installation of a new monitoring well in the vicinity of site ST-070E as requested by NMED. A CPA brings together environmental remediation experts, including environmental regulators, to assess raw data to provide an in-depth assessment of remediation strategies for a site. Evaluations are tailored to the remedial status of a site and may include: identifying data gaps and needed characterization activities, evaluating success and failures of deployed remedial technologies, evaluating applicability of innovative technologies, and recommending remedial strategies, conceptual remediation designs and performance models.

An initial CPA scoping meeting was held for ST-070E on September 19, 2019 with Air Force Civil Engineer Center Technical Directorate and Kirtland Air Force Base (AFB) staff. A detailed on-site CPA evaluation with Air Force staff and a third-party contractor is tentatively scheduled for the week of November 18<sup>th</sup> at Kirtland AFB. The Air Force invites NMED's

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Hazardous Waste Bureau staff to participate in the evaluation to provide technical input into the remedial strategy and development of performance objectives for the site.

Accordingly, to allow for this further analysis at the site the Air Force is requesting a 270 day extension be applied to the ST-070E Groundwater Work Plan that is due November 10, 2019 and the Interim Measures Work Plan that is due December 18, 2019. The Air Force requests a new due date of August 7, 2020 for submittal of the Groundwater Work Plan and a new due date of September 13, 2020 for submittal of the Interim Measures Work Plan which will incorporate and address recommendations from the CPA.

This extension request will allow any necessary funding to be secured after the CPA recommends a path forward, and will allow time for contract scoping, contract award, and work plan development if needed. Please note that if any additional remediation measures are recommended for ST-070E, these activities will be contingent upon federal funding priorities.

Please let Mr. Scott Clark or Ms. Suzanne Devergie know by November 15, 2019 whether you will participate in the CPA. Mr. Clark can be reached at (505) 846-9017 or via email at [scott.clark@us.af.mil](mailto:scott.clark@us.af.mil). Ms. Devergie can be reached at (505) 853-7213, or via email at [suzanne.devergie@us.af.mil](mailto:suzanne.devergie@us.af.mil).

Sincerely



CHRISTOPHER J. KING, Colonel, USAF  
Vice Commander

cc:

NMED-HWB (Cobrain, Davidson, Stringer)  
AFCEC-CZRX (Segura, Renaghan, Paul)  
EPA Region 6 (King)  
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