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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

FEB 18 2020

Colonel David S. Miller
Base Commander
377 ABW/CC
2000 Wyoming Blvd SE
Kirtland AFB, NM 87117

Lt. Colonel Wayne J. Acosta
Civil Engineer Office
377 Civil Engineering Division
2050 Wyoming Blvd SE, Suite 116
Kirtland AFB, NM 87117

**RE: APPROVAL WITH MODIFICATION
FOURTH EXTENSION REQUEST - FINAL ST-070E – OIL WATER SEPARATOR, ST-219
(SWMU ST-70) GROUNDWATER WELL WORK PLAN
KIRTLAND AIR FORCE BASE, NEW MEXICO
EPA ID # NM9570024423
HWB-KAFB-15-010**

Dear Colonel Miller and Colonel Acosta:

The New Mexico Environment Department (NMED) received the U.S. Air Force (Permittee) Kirtland Air Force Base (Facility) *Fourth Extension Request - Final ST-070E – Oil Water Separator, ST-219 (SWMU ST-70) Groundwater Well Work Plan Extension Request* (Request), on January 3, 2020. The Request states that a formal evaluation, or Critical Process Analysis (CPA), is required to justify funding for the monitoring well installation and invites NMED to take part in the CPA for the well installation. The Request was received three days before the Groundwater Well Work Plan was required to be submitted. As stated previously in several extension request approval letters, all future extension requests must be provided a minimum of 10-days prior to the required submittal date. Failure to provide extension requests in a timely manner may result in denial of the requests.

The Interim Measures Work Plan (IMWP) for ST-70 was first received in March 2015. In a disapproval letter sent July 1, 2015, NMED required the Permittee, in part, to propr

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installation of a groundwater monitoring well downgradient of the plume in the revised IMWP. The IMWP Revision 1 was submitted March 28, 2016 and did not contain any reference to installation of a new groundwater monitoring well. The Permittee's response to comments for the disapproval state that the well is not needed because the (previous) SVE system was no longer using KAFB-7002/7003 as an extraction well. The lack of information regarding the direction of groundwater flow was not addressed. NMED disapproved the IMWP Revision 1 in a letter dated May 12, 2016 and again required the proposal for a downgradient groundwater monitoring well in a revised IMWP.

The IMWP Revision 2 was submitted October 25, 2016. Again, there was no reference to installation of a new groundwater monitoring well. The Permittee's response to comments for the disapproval state that the well is not needed and that the groundwater flow direction is east northeast and, therefore, well KAFB-7001, positioned somewhat north of the plume, is adequate. Evidence for the direction of groundwater flow was not included in the response to comments or in the revised IMWP.

A Well Completion Report, documenting the installation of three new SVE wells, was submitted on May 31, 2017. On August 8, 2017, NMED disapproved the Well Completion Report and again required the proposal of a downgradient groundwater monitoring well in the revised IMWP.

The IMWP Revision 3 was submitted February 28, 2018. Similar to the IMWP Revision 2, there was no reference to installation of a new monitoring well or additional evidence for confirming the direction of groundwater flow. The Permittee's response to comments included in NMED's disapproval state that a downgradient monitoring well is not needed because VOC concentrations in the well cuttings of the new SVE wells were low and vapor concentrations in the SVE system were low. On April 18, 2018, NMED disapproved the IMWP and again required the proposal of a downgradient monitoring well in the revised IMWP.

The IMWP Revision 4 was submitted October 4, 2018. The IMWP stated that if NMED requires an additional groundwater monitoring well, this monitoring well will be installed under a separate work plan. On December 18, 2018, NMED disapproved the IMWP and required a groundwater well work plan that contained a current potentiometric map and a proposed location for a new groundwater monitoring well.

NMED approved extension requests for the groundwater monitoring well work plan on March 20, 2019, September 10, 2019, and November 21, 2019.

NMED has directed the Permittee to install a groundwater monitoring well at ST-070 for over four and a half years. The Permittee has either ignored NMED's direction or has proposed tasks that only serve to delay the installation. The latest task is the CPA. It is apparent to NMED that the CPA process is unnecessarily time-consuming; therefore, NMED directs the Permittee to provide a work plan detailing the installation of two new groundwater monitoring wells at ST-

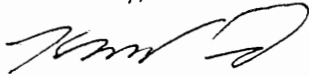
070 to determine the groundwater flow direction. Installation of two wells in the vicinity of ST-070 will provide the information required to derive the direction of groundwater flow for the site and alleviate the need for the CPA. Failure to follow NMED direction constitutes noncompliance and may result in an enforcement action.

At recent meetings with you and your staff, the need for timely action by NMED to move this overall project forward was stressed. The continued refusal to install the requested wells along with the suggestion, after more than four years, that a CPA is necessary creates a substantial burden on NMED resources and further undermines our joint commitment to timely action.

NMED hereby grants the Permittee's request for a time extension and is requiring the Permittee to submit a Work Plan for the installation of two wells in order to triangulate groundwater flow and monitor groundwater downgradient of the contamination plume. The Permittee must submit the work plan that includes a proposed date for well installation no later than **May 21, 2020**.

If you have any questions regarding this letter, please contact me at (505) 476-6035, or your staff may contact Naomi Davidson at (505) 222-9504.

Sincerely,



Kevin Pierard
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
N. Davidson, NMED HWB
B. Wear, NMED HWB
L. King, EPA Region 6 (GLCRRC)
S. Clark, KAFB

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