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Cabinet Secretary

Jennifer J. Pruett  
Deputy Secretary

MAR 20 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: **SECOND DISAPPROVAL  
RESPONSE TO DISAPPROVAL OF FINAL INVESTIGATION SUMMARY REPORT FOR SOLID  
WASTE MANAGEMENT UNIT 6-24, MANZANO SEWAGE TREATMENT FACILITY (WP-  
016), FEBRUARY 2018  
KIRTLAND AIR FORCE BASE, NEW MEXICO  
EPA ID # NM9570024423  
HWB-KAFB-18-001**

Dear Colonel Miller and Colonel Acosta:

The New Mexico Environment Department (NMED) received the U.S. Air Force (Permittee) Kirtland Air Force Base (Facility) response letter (Response) to the *Disapproval, Final Investigation Summary Report for Solid Waste Management Unit 6-24, Manzano Sewage Treatment Facility (WP-16), February 2018*, on December 2, 2019. NMED has reviewed the Response and hereby issues this Disapproval with the following comments.

**COMMENTS**

**1. Inappropriate Response to Disapproval**

**NMED Comment:** The March 28, 2019 Disapproval letter required the Permittee to submit a revised report summarizing the monitoring results by September 30, 2019. The response letter was received two months later than the required due date and 1) did not have the required data from sample analysis or a schedule for when analysis

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would be completed,2) was not in the format of a revised Report, and 3) did not have an electronic redline strikeout version of the revised Report.

## 2. Well Sampling and Analysis

**Permittee Statement:** "Accordingly, Well KAFB-6243 will be rolled into the nitrate abatement and monitoring program and addressed in the Stage II Abatement Plan."

**NMED Comment:** In the disapproval letter dated March 28, 2019, NMED directed the Permittee to sample monitoring well KAFB-6243 and update the Report to include data from the analysis, and to sample KAFB-6243 semi-annually for a minimum of two years (four sampling events) to determine whether contamination is present in groundwater at that location. Simply adding KAFB-6243 to the Stage II Nitrate Abatement Plan (AOC TAG under the RCRA Permit) is not appropriate at this time, because the well is associated with SWMU 6-24 (WP-016) and there is not sufficient data to verify the presence or absence of contamination (nitrate or otherwise). SWMU 6-24 will not be eligible to propose Corrective Action Complete (CAC) until this issue is resolved.

The Permittee must sample monitoring well KAFB-6243 semi-annually for a minimum of two years for volatile organic compounds using EPA Method SW-846 Method 8260B, semi-volatile organic compounds using EPA Method SW-846 Method 8270E, dissolved metals using EPA Method SW-846 Method 6010B/7470A, anions using EPA Method EPA Method 300.0, nitrate using EPA Method EPA Method 353.2, and total dissolved solids using EPA Method EPA SM 2540C, and submit the results to NMED in an annual report.

The Permittee must submit two annual monitoring reports for SWMU 6-24 (WP-16) with analytical results for samples collected from monitoring well KAFB-6243. The annual reports must be submitted no later than April 30th of each calendar year; the first annual report will be due **April 30, 2021**.

The Permittee must also submit a revised Report that addresses all comments contained in this Disapproval. The Permittee must include a response letter (also included as an appendix) that cross-references where NMED's associated numbered comments were addressed. The Permittee must also submit an electronic redline-strikeout version of the revised Report showing all changes that have been made to the Report, as well as an electronic version of the revised Report. The revised Report must be submitted no later than **October 30, 2020**.

Col. Miller and Lt. Col. Acosta  
Response to Disapproval, Investigation Summary Rpt WP-16  
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If you have any questions regarding this letter, please contact Naomi Davidson at (505) 222-9504.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kevin Pierard', written in a cursive style.

Kevin Pierard  
Chief  
Hazardous Waste Bureau

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

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