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ENVIRONMENT DEPARTMENT



ENTERED



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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

JUL - 2 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: **DISAPPROVAL**
WORK PLAN FOR KIRTLAND AFB WYO-4 AREA OF CONCERN RCRA FACILITY WORK
PLAN, REVISION 1, APRIL 2020
KIRTLAND AIR FORCE BASE, NEW MEXICO
EPA ID # NM9570024423
HWB-KAFB-19-013

Dear Colonel Miller and Colonel Acosta:

The New Mexico Environment Department (NMED) received the U.S. Air Force (Permittee) Kirtland Air Force Base (Facility) *Work Plan for Kirtland AFB WYO-4 Area of Concern RCRA Facility Work Plan, Revision 1, April 2020* (Work Plan), on May 1, 2020. NMED has reviewed the Work Plan and hereby issues this Disapproval with the following comments:

1. Section 4.1 Monitoring Well Installation and Sampling

Permittee Statement: "The scope of this work plan includes the installation of three perched zone groundwater monitoring wells, one soil vapor monitoring point and collection of groundwater and soil vapor samples from the proposed wells, as well as from several existing wells in the area of WYO-4 AOC. Locations of the proposed groundwater and soil vapor monitoring wells are shown in Figure 9."

KAFB4973



NMED Comment: The proposed locations for the monitoring wells are not appropriate for the investigation because all of them are over 1000 feet away from WYO-4. Revise the Work Plan to include proposed well locations that are within 250 feet of WYO-4. Additionally, the Permittee must propose to install a replacement groundwater monitoring well for WYO-4 within 30 feet of its location.

2. Section 6.1, Proposed Wells, Monitoring and Media Sampling and Analysis

Permittee Statement: "Proposed wells, samples and analytical methods are summarized in Table 3."

NMED Comment: Add anions (including nitrate) and TDS to the list of proposed groundwater analyses.

3. Section 6.1, Proposed Wells, Monitoring and Media Sampling and Analysis

Permittee Statement: "A total of four quarterly monitoring events is proposed for the existing and WYO-4 Investigation Wells and is included in Table 4."

NMED Comment: The existing and proposed WYO-4 wells must be sampled for a minimum of eight quarterly events. The Permittee must submit annual monitoring reports.

The Permittee must submit a revised Work Plan (two hard copies and two electronic copies) that corrects all the deficiencies noted in this Disapproval. The revised Work Plan must be accompanied by a response letter (also included as an appendix) that details where the NMED's comments were addressed and cross-references the numbered comments. In addition, the Permittee must submit an electronic redline-strikeout version of the revised Work Plan that shows where all changes were made to the Work Plan. The revised Work Plan must be submitted no later than **September 30, 2020**.

Col. Miller and Lt. Col. Acosta
RFI Work Plan WYO-4 Rev 1
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If you have any questions regarding this letter, please 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 (6LCRRC)
S. Clark, KAFB

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