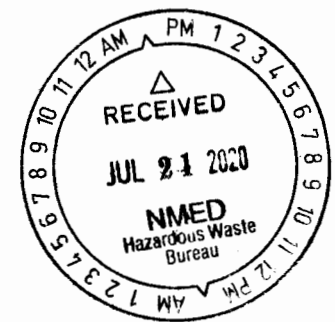




ENTERED

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



16 July 2020

Colonel Ryan Nye, USAF
Vice Commander
377th Air Base Wing
2000 Wyoming Blvd SE
Kirtland AFB NM 87117

Mr. Kevin Pierard, Chief
Hazardous Waste Bureau (HWB)
New Mexico Environment Department (NMED)
2905 Rodeo Park Drive East, Building 1
Santa Fe NM 87505-6303

Dear Mr. Pierard

The Air Force has recently received several letters as detailed below from the New Mexico Environment Department's (NMED's) Hazardous Waste Bureau (HWB) in which more global comments and regulatory directives not specifically relating to the document under review have been provided. As discussed in our 23 June 2020 conference call, these types of comments and directives create confusion in the administrative record for the Kirtland Air Force Base Bulk Fuels Facility, Solid Waste Management Units ST-106/SS-111 project. These global directions are essentially "hidden" from the public because the subject line of the document does not indicate the future direction, making it difficult to find and retrieve from the administrative record. In addition, because the HWB does not maintain a comprehensive record of these directives, HWB staff may subsequently issue inconsistent or contradictory direction to the Air Force. This practice also has the potential for inadvertent noncompliance by the Air Force.

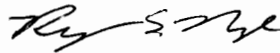
The Air Force respectfully requests that the HWB issue separate letters of direction for each of the recent global directions identified in Attachment 1, Memorandum from Kevin M. Pierard to Col David S. Miller and Lt Col Wayne J. Acosta with the subject line: *Disapproval, Work Plan for Shallow Soil Vapor Sampling, Bulk Fuels Facility, Solid Waste Management Units ST-106/SS-111, Kirtland Air Force Base, New Mexico, EPA ID# NM9570024423, HWB-KAFB-19-014*, dated 26 May 2020, and in all future communications. The Air Force also requests a meeting with HWB staff to discuss questions regarding the global directions listed in Attachment 2, Memorandum from Kevin M. Pierard to Col David S. Miller and Lt Col Wayne J. Acosta with the subject line: *Disapproval, Ethylene Dibromide In Situ Biodegradation Pilot Test Report, Bulk Fuels Facility, Solid Waste Management Units ST-106/SS-111, Kirtland Air Force Base, New Mexico, EPA ID# 6213820974, HWB-KAFB-19-011*, dated 04 March 2020.

KAFB4977



If you have any questions or would like to schedule a meeting to discuss the global directions listed in Attachment 2, please contact Mr. Sheen Kottkamp at 505-846-7674 or sheen.kottkamp.1@us.af.mil.

Sincerely


RYAN NYE, Colonel, USAF
Vice Commander

Attachment 1:

Table 1: Global Comments from NMED having Air Force Agreement

Attachment 2:

Table 2: Global Comments from NMED Requiring Further Discussion

cc:

NMED HWB (Pierard), electronic and hardcopy

NMED Resource Protection Division (Stringer), electronic only

NMED HWB (Cobrain), electronic only

NMED OGC (Hower), electronic only

SAF/IEE (Lynnes), electronic only

377 ABW/JA (Cicarelli), electronic only

AFCEC/CZ (Cash, Kottkamp, Segura), electronic only

USACE-ABQ District Office (Moayyad), electronic only

Public Info Repository, Administrative Record/Information Repository (AR/IR) and File

ATTACHMENT 1
Global Comments from NMED having Air Force Agreement

NMED Comment	Reference Location	Comments
<p>“The Permittee must include their Response to Comments (RTCs) in a document appendix for all revised documents submittals. While the Permittee submitted the RTCs in a separate electronic file, the RTCs must be included as an appendix to the plan to allow stakeholders and the public easy access when reviewing the document. For all future revised documents submitted to NMED, the Permittee must include the RTCs as an appendix to the document. Please revise the Work Plan accordingly. This was discussed on May 7; KAFB agreed to follow this procedure.”</p>	<p>Comment 1 in Attachment 1 – NMED Comments of 26 May 2020 Letter*</p>	<p>Air Force agrees with this direction</p>
<p>“Comment #1 of NMED’s July 26, 2019 Rejection letter states, “...the pages of the attachments contain no page numbers...In order for NMED to be able provide comments that reference where issues are found, as well as for the public to be able to review the document in the Administrative Record, every page of every document submitted must be numbered appropriately. The Permittee must submit a work plan in the appropriate format, including addition of the appropriate information in the corresponding sections, based on the Permit requirements and must sequentially number every page in the document.”</p> <p>The Permittee failed to sequentially number all pages of the document as directed by NMED in the Tables section, the Figures Section, and all three appendices of the Work Plan. In addition, the appendices contain tables with no table numbers, figures with no figure numbers, and multiple pages with no page numbers at all. The Permittee must ensure that all submittals, including the revised Work Plan, include sequential page numbers on all pages, and that tables, figures, and appendices are properly numbered. Making this correction will facilitate timely review and precise communication between NMED and KAFB on all documents submitted for review. It will also facilitate references to information and subsequent activities (e.g., review of corrective action documents). Please revise the Work Plan accordingly. This was discussed on May 7; KAFB agreed to follow this procedure.”</p>	<p>Comment 2 in Attachment 1 – NMED Comments of 26 May 2020 Letter*</p>	<p>Air Force agrees with this direction</p>
<p>“The Permittee has used multiple designations for wells in the Work Plan. For instance, Section 3.1 of the Work Plan discusses wells KAFB-SV-01, KAFB-SV-02, KAFB-SV-03, etc., while Table 1 of the Work Plan lists these wells as KAFB-106-SV01, KAFB-106-SV02, KAFB-106-SV03, etc. and Figure 2 of the Work Plan lists the wells as KAFB-106SV01, KAFB-106SV02, KAFB-106SV03, etc. Use of multiple designations inhibits NMED’s ability to timely review documents by limiting the search function and causing confusion when searching for data in spreadsheets or databases. This issue is evident in many documents submitted by the Permittee. The Permittee must use the official full designation for each well consistently in the revised Work Plan and in all future documents submitted to NMED. This was discussed on May 7; KAFB agreed to follow this procedure.”</p>	<p>Comment 3 in Attachment 1 – NMED Comments of 26 May 2020 Letter*</p>	<p>Air Force agrees with this direction</p>

NMED Comment	Reference Location	Comments
<p>“Based on prior issues with missing information in submittals, NMED is clarifying what it requires for this and all future submittals. In addition to the information listed above, the permittee is required to include the following:</p> <ul style="list-style-type: none"> • The response to NMED’s comments must be included as Appendix A of each document revision. • Descriptions of all field activities performed for the project must be provided. References to QAPPs, SOPs, or work plans are not acceptable. All deviations from the approved work plan must be discussed and justified in a Deviations section. • Wells must be consistently referred to by the same name/designation and all sections of the text, all tables, and all figures. The designation must match that provided in the digital analytical data files, as well. • Sampling data tables must include the LOQ (PQL) and reporting detection limit for each analysis. • Sampling data tables must include the appropriate screening levels for data comparison. • Analytical data tables in digital format must include a column that indicates which analytical data report the specific sample information can be found. This link must correspond to the analytical data report file name. • Data from analyses where the LOQ exceeds the VISL are data quality exceptions and must be identified as such an all tables and figures. • Analytical data provided in digital format such as Excel or Access files must be provided in a sortable, searchable format. In other words, previous reports have provided digital data in the same format as the tables in the text. These tables are not sortable or searchable. Provide the tables in a standard database format. • Analytical data packages must be submitted in accordance with Permit Section 6.5.18.2, Laboratory Deliverables. • All tables, figures, and appendices must be appropriately numbered and titled. • Every page of every submittal, including all pages within all sections and appendices, must be numbered either sequentially or in some other logical format. <p>This was discussed on May 7; KAFB agreed to follow this procedure.”</p>	<p>Comment 11 in Attachment 1 – NMED Comments of 26 May 2020 Letter*</p>	<p>Air Force agrees with this direction</p>

*Memorandum from Kevin M. Pierard to Col David S. Miller and Lt Col Wayne J. Acosta with the subject line: *Disapproval, Work Plan for Shallow Soil Vapor Sampling, Bulk Fuels Facility, Solid Waste Management Units ST-106/SS-111, Kirtland Air Force Base, New Mexico, EPA ID# NM9570024423, HWB-KAFB-19-014. 26 May 2020.*

ATTACHMENT 2
Global Comments from NMED Requiring Further Discussion

NMED Comment	Reference Location	Comments
<p>“The collection of soil samples for laboratory analyses is necessary for every boring in the source area. The soil sampling data will provide useful information to determine the extent of soil contamination. The described field screening method does not provide sufficient data for site characterization. Propose to collect soil samples from every boring at the site in all future work plans.”</p>	<p>Comment 9 in Attachment to 04 March 2020 Letter*</p>	<p>Air Force requests a meeting with NMED to discuss this global direction</p>
<p>“A primary focus for the remedy at the site is an abatement of LNAPL. Once LNAPL is abated, the concentrations of the dissolved constituents are likely to gradually decrease. Therefore, the screened intervals of the extraction wells should not have been designed to be submerged below the water table. In the future, the screened intervals of all shallow groundwater monitoring and recovery wells must intersect the water table to capture LNAPL unless otherwise pre-approved by NMED.”</p>	<p>Comment 27 in Attachment to 04 March 2020 Letter*</p>	<p>Air Force requests a meeting with NMED to discuss this global direction</p>

*Memorandum from Kevin M. Pierard to Col David S. Miller and Lt Col Wayne J. Acosta with the subject line: *Disapproval, Ethylene Dibromide In Situ Biodegradation Pilot Test Report, Bulk Fuels Facility, Solid Waste Management Units ST-106/SS-111, Kirtland Air Force Base, New Mexico, EPA ID# 6213820974, HWB-KAFB-19-011. 04 March 2020.*