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ENTERED



James C. Kenney  
Cabinet Secretary

Jennifer J. Pruett  
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 26, 2021

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**  
**2011 RESOURCE CONSERVATION AND RECOVERY ACT FACILITY INVESTIGATION**  
**REPORT FOR GROUNDWATER BENEATH SOLID WASTE MANAGEMENT UNIT WP-26,**  
**SEWAGE LAGOONS, REVISION 1, NOVEMBER 2019**  
**KIRTLAND AIR FORCE BASE, NEW MEXICO**  
**EPA ID # NM9570024423**  
**HWB-KAFB-12-007**

Dear Colonel Miller and Colonel Acosta:

The New Mexico Environment Department (NMED) received the U.S. Air Force (Permittee) Kirtland Air Force Base (Facility) *2011 Resource Conservation and Recovery Act Facility Investigation Report for Groundwater Beneath Solid Waste Management Unit WP-26, Sewage Lagoons, Revision 1, November 2019* (Report), on December 20, 2019. NMED has reviewed the Report and hereby issues this Disapproval with the following comments:

**1. Interim Measures Work Plan**

**NMED Comment:** The Interim Measures Work Plan (IMWP) extension request, dated December 21, 2017, stated that additional data would be gathered in order to adequately characterize conditions regarding interim measures for SWMU WP-026. It is unclear if any



work at WP-026 has occurred other than routine groundwater monitoring reported under long term monitoring reports. A revised IMWP was required to be submitted no later than June 1, 2018; to date, a revised IMWP has not been received. The revised IMWP should be submitted after NMED approval of the revised Report.

## 2. Include Additional Data

**NMED Comment:** The revised Report included a new Appendix F with a Table F-2 that adequately summarized the perched groundwater unit and perching layer identification. However, water levels and TCE concentration tables and graphs from previous monitoring reports were not summarized in the revised Report, and maps depicting the extents of the perched aquifer and TCE plume over time since 2011 also were not included.

The Permittee must revise the Report to summarize water level and TCE concentration data over time for the perched aquifer wells. The revised Report must document all additional data gathered for characterization of WP-026 since 2017. Include Table F-2 of the Report and add the elevations of the measuring points for depth to water measurements and documentation of any changes to the measuring point(s). The report must also include tables with groundwater level data and TCE concentrations over time, graphs of water levels and TCE concentrations over time, and maps showing the extent of the perched aquifer and TCE plume over time since 2011. Tables, graphs, water level maps, and concentration maps must document any necessary changes due to the USGS well survey that took place sometime around 2016.

## 3. Section 4.2, Recommendations

**Permittee Statement:** "Therefore, in order to get an assessment of hydraulic properties in the perched groundwater unit, it is recommended to conduct slug testing in the WP-026 perched groundwater unit wells that underlie the former Sewage Lagoons."

**NMED Comment:** Slug testing does not provide adequate data on hydraulic properties and is not acceptable for aquifer characterization. In wells that contain low water levels, a slug test will likely only provide the characteristics of the filter pack rather than the aquifer, even when submerging the slug completely is possible.

The Permittee must determine the hydraulic conductivity of the soils in the vicinity of the perched aquifer. Therefore, the Permittee must propose to conduct a constant discharge test at an appropriate flow rate in order to determine the perched aquifer properties. The rate of discharge may, of necessity, be very low.

The Permittee must submit a revised Report that corrects all of the deficiencies noted in this Disapproval. The revised Report must be accompanied by a response letter (also included as an

Col. Miller and Lt. Col. Acosta  
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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 Report that shows where all changes were made to the Report. The revised Report must be submitted no later than **July 1, 2021**.

If you have any questions regarding this letter, please contact Naomi Davidson at (505) 222-9504.

Sincerely,

Kevin Pierard Digitally signed  
by Kevin Pierard  
Date: 2021.01.26  
09:54:10 -07'00'

Kevin M. 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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