



Michelle Lujan Grisham
Governor

Howie C. Morales
Lt. Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT
Hazardous Waste Bureau**

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 **ENTERED**



James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 11, 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 Engineer Division
2050 Wyoming Blvd SE, Suite 116
Kirtland AFB, NM 87117

**RE: TECHNICAL MEMO: BIOVENTILATION PILOT TEST NOVEMBER 23rd 2020 SHUTDOWN
BULK FUELS FACILITY SOLID WASTE MANAGEMENT UNITS ST-106 AND SS-111
KIRTLAND AIR FORCE BASE, NEW MEXICO
EPA ID# NM6213820974
HWB-KAFB-20-001**

Dear Colonel Miller and Lt. Colonel Acosta:

The New Mexico Environment Department (NMED) received the U.S. Air Force (Permittee) Kirtland Air Force Base (Facility) Technical Memo for *Bioventing Pilot Test November 23rd 2020 Shutdown*, dated January 13, 2020. NMED has reviewed the letter for the Technical Memo and concurs with the Permittee's decision to permanently terminate the bioventilation pilot test. NMED did not review the Technical Memo in detail and this letter should not be construed as NMED concurrence with the Technical Memo or the Permittee's conclusions regarding data sufficiency or the feasibility of bioventilation as a remedial option for the Bulk Fuels Facility Spill site.

NMED concurs with the decision to terminate the bioventilation pilot test based on concerns regarding the mobilization and potential migration of soil vapor contamination to off-site locations. As stated previously by NMED in formal correspondence to the Permittee on

KAFB5030


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February 25, 2019 regarding the Bioventilation Pilot Testing: "... include a schedule for at least two soil vapor sampling events, one in the summer and one in the winter, that shall be timed to verify that bioventing pilot testing is not causing an increase in shallow soil vapor contaminant levels in the residential and VA hospital areas." To date, the effects of the bioventing test have not been evaluated.

The Permittee must submit an Investigation Report describing the bioventilation pilot testing in accordance with Section 6.2.4.3 of the Permittee's Hazardous Waste Treatment Facility Operating Permit, EPA ID No. NM9570024423. The Investigation Report must be submitted no later than **October 29, 2021**.

In addition, NMED has made efforts to set up a meeting to discuss its Disapproval provided for the Bioventilation Construction and Initiation Report since August 2020. NMED remains willing to meet with you and your staff.

If you have any questions regarding this letter, or to schedule a meeting regarding the NOD, please contact me at (505) 476-6035.

Sincerely,

**Kevin
Pierard** Digitally signed
by Kevin Pierard
Date: 2021.02.11
12:39:41 -07'00'

Kevin M. Pierard, Chief
Hazardous Waste Bureau

cc: B. Wear, NMED HWB
M. Suzuki, NMED HWB
L. Andress, NMED HWB
S. Kottkamp, KAFB
K. Lynnes, KAFB
C. Cash, KAFB
D. Agnew, ABCWUA
A. Tafoya, VA

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