

March 9, 2021

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Gov. Michelle Lujan Grisham  
490 Old Santa Fe Trail Room 400  
Santa Fe, NM 87501

Dear Governor Grisham,

The Board of the Albuquerque Bernalillo County Water Utility Authority requests your assistance as the utility and other agencies work to overcome several obstacles threatening the successful cleanup of the Kirtland Air Force Base (KAFB) Bulk Fuels Facility (BFF) jet fuel leak. As you are aware, this leak has resulted in significant contamination of the local aquifer—an important source of drinking water—and has been of great concern to us for many years now.

While the installation (begun in 2015) of a pump-and-treat remediation system represented significant progress, many issues remain that place the cleanup's timely and successful completion at risk. We respectfully request your intercession with the Air Force regarding these matters:

#### **Timeline**

Cleanup at the site has slowed alarmingly. The Air Force has not provided an updated timeline and has yet to complete the necessary prerequisites for implementation of a final remedy.

Specifically, the Air Force has not yet submitted a complete Facility Investigation Report (RFI) to the New Mexico Environment Department (NMED) for approval, a precondition for Corrective Measures Evaluations (CMEs) under the Resource Conservation Recovery Act (RCRA). This is despite an Air Force statement in 2019 that the needed CME, which will identify the final remedy, would be under way by 2021. This delay is especially frustrating because it comes in combination with A) the discontinuation of interim mitigation measures (e.g., soil vapor extraction and bioventing), and B) the Air Force's reluctance to improve the existing pump-and-treat remediation system.

So that we can fully understand the pace and direction of the project, we ask that the Air Force provide up-to-date timelines and regular status updates.

#### **Budget**

A 2020 document provided by the Air Force indicated that spending on BFF cleanup totaled \$2.3 million for Fiscal Year (FY) 2019, down more than 80 percent from the previous year. The funding decline is vexing, as it comes at a time of increasing project complexity including operation of the pump-and-treat system; the addition of groundwater monitoring wells; and the operation of two



additional interim measures at the site.

In addition to an updated FY 2020 budget, we ask that the Air Force provide an FY 2021 budget, complete with activity descriptions, as soon as possible.

### **Data Gaps**

The dearth of groundwater monitoring wells that reach the water table at the cleanup site has resulted in an incomplete understanding of the concentration of ethylene dibromide (EDB) contamination in the aquifer.

Only 28 of the 150 groundwater monitoring wells at the site are at the water table, and these are primarily located on-base, near the source of the leak. This restricts our understanding of the true extent of EDB contamination. The limitation of the network also impacts Air Force's estimates of EDB removed by the pump-and-treat system, potentially over-stating the success of the system and generating unreliable data for incorporation into the CME.

Meanwhile, because complete cleanup at the site is impossible unless EDB contamination in the deep aquifer is fully delineated, there is a need for at least one additional monitoring well at depth in the northernmost extent of the groundwater contamination. The funding responsibility for this well belongs to the Air Force, but it has shown no interest in paying for it. The Water Authority, which must protect its customers, is now unfairly tasked with seeking other federal and state dollars to finance the well's construction.

Other critical data gaps exist in determining where jet fuel remains in the ground itself, and these have been documented in NMED Notices of Disapproval. These gaps obscure our understanding of shallow soil vapor and the nature and extent of light non-aqueous phase liquid (LNAPL). Still, NMED informs us that the Air Force is refusing to collect further LNAPL data pending Pentagon review. The Water Authority seeks your support in requesting that the Air Force comply with the requirements documented in NMED Notices of Disapproval, allocate appropriate funding to fill these data gaps, and open discussions with the Water Authority and other technical experts to identify where data collection efforts should be focused.

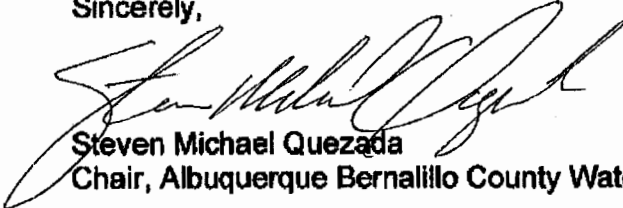
### **Reporting and Stakeholder Engagement**

Between 2014 and 2018, stakeholder engagement in the cleanup process was robust and included routine provision by the Air Force of updated timelines and progress reports, and regular meetings of technical working groups (TWGs). These involved technical staff from the Water Authority, NMED, the City of Albuquerque (City), the U.S. Geological Survey (USGS), the U.S. Environmental Protection Agency (EPA), and Air Force staff and contractors.

Unfortunately, stakeholder engagement has degraded over the past three years. There has not been a TWG meeting since August 2019, despite numerous requests by stakeholders; these have been replaced by monthly conference calls with little or no opportunity for stakeholder input. Furthermore, stakeholders are no longer copied on correspondence, timelines, and reports and must rely on online administrative records, which are often out of date. The bottom line: stakeholders are unable to provide input on key datasets and decisions in a timely manner. The Water Authority strongly wishes to see the re-establishment TWGs and regular inclusion on transmittal of project documents.

The Water Authority Board would appreciate your assistance in working with us and the Air Force to address the concerns identified in this letter. We believe such a collaboration will greatly facilitate a successful cleanup, and result in much greater community confidence in the Air Force's efforts at the BFF site.

Sincerely,



Steven Michael Quezada  
Chair, Albuquerque Bernalillo County Water Utility Authority