



MICHELLE LUJAN GRISHAM  
GOVERNOR

**ENTERED**  
JAMES C. KENNEY  
CABINET SECRETARY

**Certified Mail - Return Receipt Requested**

January 18, 2021

Colonel Jason F. Vattioni  
Commander  
377th Air Base Wing  
2000 Wyoming Blvd SE  
Kirtland AFB, NM 87117

Melissa Clark  
377 MSG/CEIE  
2050 Wyoming Blvd SE  
Kirtland AFB, NM 87117

**RE: DISAPPROVAL  
FINAL FISCAL YEAR 2020 LONG-TERM MONITORING REPORT ST-070E  
OIL-WATER SEPARATOR (ST-219), MARCH 2021  
KIRTLAND AIR FORCE BASE, NEW MEXICO  
EPA ID# NM9570024423  
HWB-KAFB-21-008**

Dear Colonel Vattioni and Ms. Clark,

The New Mexico Environment Department (NMED) received the U.S. Air Force (Permittee) Kirtland Air Force Base (Facility) *Final Fiscal Year 2020 Long-Term Monitoring Report ST-070E - Oil-Water Separator (ST-219), March 2021* (Report) on September 21, 2021. NMED has reviewed the Report and hereby issues this Disapproval with the following comments:

**1. Section 1.2.1, Historical SVE Operations and Monitoring Activities**

**Permittee Statement:** "The new SVE system was started on 10 March 2018, and operated full-time until 17 May 2019, when it was shut down due to GAC breakthrough. The SVE system is currently shut down."

**NMED Comment:** The Permittee did not seek NMED input or approval prior to shutting down the SVE system, nor was an adequate explanation for SVE system shutdown provided. The Permittee must provide justification that contaminant concentrations are sufficiently low enough to demonstrate that operating the SVE system is no longer necessary. After gaining NMED concurrence that treatment is no longer needed, a shutdown may commence. Revise the report to provide justification for SVE system shutdown.

SCIENCE | INNOVATION | COLLABORATION | COMPLIANCE

Hazardous Waste Bureau - 2905 Rodeo Park Drive East, Building 1, Santa Fe, New Mexico 87505-6313  
Telephone (505) 476-6000 - [www.env.nm.gov](http://www.env.nm.gov)

KAFB5088



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## 2. Section 1.2.3, Constituent Trends in Vapor Monitoring Wells

**Permittee Statement:** “No additional vapor monitoring has been conducted at Site ST-070E since SVE operations were halted in May 2019.”

**NMED Comment:** While a sampling frequency for all of the soil vapor monitoring wells and soil vapor extraction wells was not explicitly stated, the approved monitoring plan for ST-70 provides for sampling all soil vapor monitoring wells and soil vapor extraction wells. While the SVE system is not operating, the Permittee must continue to collect samples from the soil vapor monitoring and extraction wells at a minimum of once per year until NMED determines that sampling is no longer warranted. The monitoring plan must be updated once the new groundwater and soil vapor monitoring wells have been installed. Revise the Report to state that vapor well monitoring will resume immediately and be conducted at least annually.

The Permittee must submit a revised Report (two hard copies and two electronic copies) that corrects all the deficiencies noted in this Disapproval. The revised Report must be accompanied by a response letter, also included as an appendix, that details where NMED’s comments were addressed and cross-references NMED’s 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 **April 4, 2022**.

If you have any questions regarding this letter, please contact Naomi Davidson at (505) 690-7567.

Sincerely,

**Rick Shean**

Digitally signed by Rick Shean  
Date: 2022.01.18 15:37:30  
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Rick Shean, 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

File: KAFB 2021 and Reading