



**Certified Mail - Return Receipt Requested**

April 11, 2022

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  
ST-070E – OIL-WATER SEPARATOR, ST-219 (SWMU ST-70) WELL COMPLETION REPORT,  
REV. 0, DECEMBER 2021  
KIRTLAND AIR FORCE BASE, NEW MEXICO  
EPA ID# NM9570024423  
HWB-KAFB-21-013**

Dear Colonel Vattioni and Ms. Clark,

The New Mexico Environment Department (NMED) received the U.S. Air Force (Permittee) Kirtland Air Force Base (Facility) *ST-070E – Oil-Water Separator, ST-219 (SWMU ST-070) Well Completion Report, Rev. 0, December 2021* (Report) on December 31, 2021. NMED has reviewed the Report and hereby issues this Disapproval with the following comments:

**1. General Deficiencies**

**NMED Comment:** All comments in this letter pertain to deficiencies in the Report related to the requirements of the KAFB Hazardous Waste Treatment Facility Operating Permit EPA ID No. NM9570024423 (Permit). All personnel and contractors performing work for this facility should be familiar with the Permit in order to provide the required information to NMED. Section 6.5. of the Permit, Technical Requirements, clearly describes the requirements related to documentation and ground water well construction. The Permittee failed to provide most of the required information.

**2. Site Plan Map, page 1-5**

**NMED Comment:** The Site Plan map failed to include the locations of the newly installed monitoring wells. The Permittee is required to prepare site maps presenting all surveyed locations and elevations of wells. Provide an updated Site Plan map that includes the newly



installed monitoring wells and other surveyed locations in the vicinity of the wells in the revised Report.

**3. Appendix D, Daily Reports**

**NMED Comment:** The daily reports inadequately describe the events of each day with regard to the requirements of Permit Section 6.5.2. The deficiencies and errors were noted in the daily reports presented in Appendix D and are detailed in comments 4 through 8 below.

**4. Appendix D, Daily Reports**

**NMED Comment:** Handwritten notes of daily field activities were not provided in the Report, and the daily reports do not comply with Permit Section 6.5.2, Documentation of Field Activities, nor do they appear similar to the field form samples provided in the NMED-approved *Final ST-070E – Oil Water Separator, ST-219 (SWMU ST-70) Investigation Work Plan, Rev. 0*. Provide the required handwritten field notes in the revised Report.

**5. Appendix D, Daily Reports**

**NMED Comment:** Each daily report is signed by Chris Coonfare, who is listed as personnel on-site for only 3 out of the 27 days of field activities, for a total of 6 hours on site. Personnel who are not onsite cannot testify to the completeness or accuracy of work performed outside of their ability to observe. Provide the required handwritten fieldnotes in the revised Report.

**6. Appendix D, Daily Reports**

**NMED Comment:** The listed equipment in the daily reports failed to include the photoionization detector (PID) used to measure volatile organic compounds. Provide the required handwritten field notes in the revised Report.

**7. Appendix D, Daily Reports**

**NMED Comment:** Calibration logs for the PID and field meter were not included in the Report. The calibration logs must be provided in order to validate the field data. The Permittee must provide the calibration logs or remove all invalid field data from the revised Report.

#### **8. Appendix D, Daily Reports**

**NMED Comment:** The photolog included after the August 25, 2021 daily report is labeled for August 24, 2021. Correct this typographical error in the revised Report.

#### **9. Appendix E, Boring Logs**

**NMED Comment:** The boring logs failed to include well construction information as required by Permit Section 6.5.17.10.10. No revision is necessary considering that the handwritten boring logs cannot be amended.

#### **10. Appendix F, Well Construction Diagrams**

**NMED Comment:** Permit Section 6.5.17.10.10, Well and Piezometer Construction Diagrams, Logs, and Boring Logs, describes the information required to be collected during monitoring well construction. The following information was missing from the well construction diagrams:

- a) Filter-pack Volume (calculated and actual)
- b) Annular sealant volume (calculated and actual)
- c) Surface sealant composition
- d) Surface sealant placement method
- e) Surface sealant volume (calculated and actual)
- f) Surface sealant interval
- g) Surface seal and well apron design and construction
- h) Type of cap and lock
- i) Ground surface elevation
- j) Survey reference point elevation
- k) Top of protective steel casing elevation

Provide the required information listed above in the revised Report.

#### **11. Appendix I, Soil Sample Laboratory Results Summary**

**NMED Comment:** The data table presented in Appendix I is unwieldy and unuseful. The deficiencies and errors noted for the table are addressed in the following comments.

#### **12. Appendix I, Soil Sample Laboratory Results Summary**

**NMED Comment:** Definitions were not provided for the abbreviations, symbols, acronyms, and qualifiers, as required by Permit Section 6.2.4.3, Investigation Reports. Revise the table to include definitions of all abbreviations, symbols, acronyms, and qualifiers.

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### 13. Appendix I, Soil Sample Laboratory Results Summary

**NMED Comment:** All analytical results were included in the table, instead of a summary table that only includes detections and any data that would be considered a data quality exception. In addition, the data were not provided electronically. The Permittee must provide the analytical results in a summary table including only detections and data quality exceptions; the Permittee must also provide all data in a searchable and sortable electronic format, such as a Microsoft Excel datasheet or Access database, in the revised Report.

### 14. Appendix I, Soil Sample Laboratory Results Summary

**NMED Comment:** The analytical laboratory reports were not provided in the Report, as required by Permit Section 6.5.18.2, Laboratory Deliverables. Analytical data presented without the support of analytical laboratory reports are considered invalid. The Permittee must provide the appropriate Level II analytical laboratory reports in the revised Report.

The Permittee must submit a revised Report (two hard copies and two electronic copies) that corrects all the deficiencies identified 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 **July 31, 2022**.

If you have any questions regarding this letter, please contact Cristina Eads at (505) 490-5808.

Sincerely,

**Rick  
Shean**

Digitally signed by  
Rick Shean  
Date: 2022.04.11  
10:57:39 -06'00'

Rick Shean  
Chief

Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
C. Eads, NMED HWB  
B. Wear, NMED HWB  
L. King, EPA Region 6 (6LCRRC)  
S. Clark, KAFB

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