



**From:** Cobrain, Dave, NMENV  
**To:** Catechis, Chris, NMENV  
**Cc:** Maestas, Ricardo, NMENV; Wear, Benjamin, NMENV; Address, Lane, NMENV  
**Subject:** KAFB BFFS Shallow Soil Vapor Investigation Work Plan  
**Date:** Tuesday, October 26, 2021 2:28:35 PM

---

Chris,

It has come to my attention that the KAFB BFFS Shallow Soil Vapor Investigation Work Plan submitted by the Air Force and currently under review by HWB was approved. This was surprising since a 16-page Disapproval letter for the work plan with supporting attachments was sent to you by Ricardo for review yesterday evening. After hearing about this I checked the KAFB October Stakeholder meeting agenda and under Recent and Upcoming Documents an approval is listed as "Received Approval for the Shallow Soil Vapor Work Plan on 03 October 2021." I subsequently checked internally and no one in the bureau is aware of this or seen an approval letter. Can you tell me who reviewed the work plan and whether it was an approval with modifications (which would have had to be extensive) or a simple approval? This approval was not issued from the bureau; therefore, it must have been issued from the OOTS? Can you tell me what the stated basis was for an approval for a work plan that, based on the HWB review, was very deficient and also unresponsive to the comments provided our previous Disapproval issued in 2020? The work proposed in the May 2021 work plan will not provide data that can be used to defend the selected site remedy(s) as being protective of human health in the inevitable hearing on the remedy selection. If the appropriate data are not collected, this will ultimately delay remedy selection until data is acquired that either demonstrates that there isn't an exposure issue or that remedial action is necessary to protect human health.

Thanks.

Dave

Dave Cobrain  
New Mexico Environment Department  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East Bldg 1  
Santa Fe, NM 87505-6313  
Main Office Phone 505-476-6000  
Direct Line 505-476-6055  
Cell 505-690-5802

KAFB5105

