

**From:** [Murphy, Robert, NMENV](#)  
**To:** [Cobrain, Dave, NMENV](#)  
**Cc:** [Wear, Benjamin, NMENV](#)  
**Subject:** KAFB Revised Source Zone Characterization Report review  
**Date:** Wednesday, July 28, 2021 12:49:52 PM



Dave,

I have taken an preliminary look at the Revised Source Zone Report (report) and responses to NMED's NOD.

Many of the issues I initially identified with the revised report have been described by Lane in her email so I will not repeat them here.

The revised report has been so significantly changed that it is essentially a new document. This complicates and adds time to the review because I will have to compare it to the old report as well as review it as a totally new report. I anticipate that we will be writing NOD comments related to unresolved issues with the original report as well as to the new content in the revised report.

There are some new statements in the response to NMED comments about technical issues with the in situ bioremediation pilot test and how these same issues would affect the air-lift enhanced bioremediation pilot test. These issues included a limited radius of influence and biofouling of the wells that would impede water flow and cause significant maintenance and redevelopment of the wells. I don't know what this is about or why it is in the response to comments and it will take me some time to figure out.

Many revisions to the report text, tables, figures, and appendices were made in response to NMED comments. In some cases entire sections of the report were deleted and data from tables was deleted rather than revisions made to the report as required, the reason being that the subject matter was not included in the scope of work in the approved work plan. Some of the information removed is required by the Permit and NMED guidance on document submittals.

In some cases an explanation was provided in the response to comments rather than a revision made to the report. These explanations are associated with technical deficiencies identified by NMED and will take time to sort out. If the technical deficiencies have not been adequately resolved then some parts of the revised report cannot be reviewed.

Data from the Phase I RFI determined by NMED to be invalid has been incorporated into the report.

Some new conclusions regarding subsurface conditions and extent of contamination appear to have been made by looking only at the data collected as part of this report.

Some ideas regarding contaminant migration that were not in the original report have been presented as fact without any lines of evidence to support the ideas. Some of these ideas directly contradict the conceptual site model that has been presented by the Permittee to NMED in other documents and technical meetings. I recommend NMED reject the revised report based on this issue alone.

KAFB5113



Because there are so many confusing elements to the revised report I cannot give an accurate estimate of how much time it will take me to review. I can say that the amount of time will be significant.

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