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DRAFT Certified Mail - Return Receipt Requested



DRAFT sent to the Division for review on 9-9-2021

September 9, 2021

Colonel Jason F. Vattioni
Base Commander
377 ABW/CC
2000 Wyoming Blvd SE
Kirtland AFB, NM 87117

Ms. Melissa Clark
Civil Engineer Office
377 Civil Engineer Division
2050 Wyoming Blvd SE, Suite 116
Kirtland AFB, NM 87117

**RE: REQUEST FOR SOIL VAPOR MONITORING WORK PLAN
BULK FUELS FACILITY SOLID WASTE MANAGEMENT UNITS ST-106 AND SS-111
KIRTLAND AIR FORCE BASE, NEW MEXICO
EPA ID# NM6213820974
HWB-KAFB-21-004**

Dear Colonel Vattioni and Ms. Clark:

The New Mexico Environment Department (NMED) evaluated the periodic soil vapor monitoring program being conducted at the Kirtland Air Force Base (Permittee) Solid Waste Management Unit ST-106/SS-111 Bulk Fuels Facility Spill (BFFS). Currently, it appears that RCRA soil vapor monitoring at the BFFS site is generally being conducted under a monitoring plan that is over ten years old; the March 2011 *Vadose Zone Investigation Work Plan Bulk Fuels Facility Spill Solid Waste Management Units ST-106 and SS-111* (2011 Work Plan). Significant changes have been made to the monitoring procedures, including those recently imposed by NMED, which are not documented in the 2011 Work Plan. In addition, monitoring locations have been added and vapor monitoring well design has changed over the past ten years.

In order to account for these changes, the Air Force must submit an up-to-date soil vapor monitoring work plan for the BFFS site to NMED for approval that describes the monitoring conducted and includes detailed descriptions of the proposed sampling methods, analytical methods, sampling frequency, and the locations and screened intervals of all wells included in the monitoring program. The work plan must include an appendix presenting the boring logs and well construction diagrams for all wells included in the monitoring program. The work plan must also include an appendix, or appendices, providing example computations related to vapor sampling, including all equations, assumptions, and variables used for the monitoring program. The work plan must also adhere to the guidelines found in NMED's *General Reporting Guidelines*

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Hazardous Waste Bureau - 2905 Rodeo Park Drive East, Building 1, Santa Fe, New Mexico
Telephone (505) 476-6000 - www.env.nm.gov

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for *Corrective Action Documents*, which can be found on NMED's website at: <https://www-archive.env.nm.gov/hazardous-waste/guidance-documents/>.

The work plan must be updated annually on **April 1st** of each subsequent year, as necessary. The updates must include changes such as the addition of new wells to the monitoring network and incorporate any proposed changes to the monitoring program (e.g., sampling frequency, analytical suite, sample collection methods). If no changes to the plan are proposed, the Permittee must submit a letter(s), specific to the plan, by **April 1st** of the corresponding year stating that no changes to the monitoring program are proposed.

The Permittee must submit the updated Bulk Fuels Facility Spill soil vapor monitoring plan no later than **December 30, 2021**.

Should you have any questions, please contact Ben Wear of my staff at (505) 690-6662.

Sincerely,

Ricardo Maestas
Acting Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
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