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October 3, 2021

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

Re: **WORK PLAN FOR THE SHALLOW SOIL VAPOR MONITORING BULK FUELS FACILITY SOLID WASTE MANAGEMENT UNITS ST-106/SS-11, MAY 2021, KIRTLAND AIR FORCE BASE, NEW MEXICO; EPA ID# NM9570024423; HWB-KAFB-21-001**

Dear Colonel Vattioni:

On May 25, 2021, the New Mexico Environment Department (NMED) received the U.S. Air Force's (Permittee) submission dated May 21, 2021: *Work Plan for the Shallow Soil Vapor Monitoring Bulk Fuels Facility Solid Waste Management Units ST-106/SS-11, May 2021* (Work Plan). NMED hereby approves the Work Plan.

The Work Plan was developed to perform additional shallow soil vapor sampling to verify the conclusions of the Risk Assessment Report, Bulk Fuels Facility Spill; Solid Waste Management Unit ST-106/SS-II, dated July 15, 2017. This requirement was established in NMED's letter sent February 25, 2019: *RE: BULK FUELS FACILITY SPILL; SOLID WASTE MANAGEMENT UNIT ST-106/SS-111 KIRTLAND AIR FORCE BASE HWB-KAFB-19-MISC*. In addition, the Work Plan reflects the incorporation of NMED's Notice of Disapproval (NOD) comments, sent May 26, 2020, that were still applicable after clarification meetings were held between James Kenney, NMED Cabinet Secretary and Mark Correll, Deputy Assistant Secretary for Environment, Safety, and Infrastructure in February 2021 consistent with the informal dispute resolution process.

The Permittee is directed to proceed with implementation of the shallow soil vapor sampling as described in the Work Plan. If sampling data collected during the first phase identifies soil vapor concentrations that indicate additional sampling is needed to "*demonstrate that there is no risk to off-site receptors located north of the Base,*" the Permittee shall work as directed by NMED to develop a second phase work plan to extend sampling from the point of detection outward. This approach builds on the concepts detailed in Sections 4.0, 6.2.1, and 6.3.1 of the U.S. Environmental Protection Agency (EPA) *Technical Guide for Assessing and Mitigating the Vapor Intrusion Pathway from Subsurface Vapor Sources to Indoor Air, Office of Solid Waste and Emergency Response, OSWER Publication 9200.2-154 (June 2015)*, which require investigations to delineate the areal extent of a subsurface vapor plume as well as preferential pathways. Following successful completion of such sampling events and subsequent data validation, the Permittee shall provide documentation of the sampling results to NMED for review prior to the submittal of the Shallow Soil Vapor Monitoring Report.



I appreciate your attention to this matter and look forward to working with you on the broader remedial efforts to secure the final remedy for the bulk fuel facility release at the base. If you have any questions regarding this letter, please do not hesitate to contact me at (505) 469-6521 or at Chris.Catechis@state.nm.us.

Sincerely,

**Chris
Catechis**

Digitally signed by Chris
Catechis
Date: 2021.10.03
20:47:58 -06'00'

Christopher S. Catechis, Acting Director
Resource Protection Division
New Mexico Environment Department

cc: Ricardo Maestas, Acting Chief NMED HWB
L. Andress, NMED HWB
L. King, EPA Region 6 (6LCRRRC)
S. Kottkamp, R. Wortman, AFCEC
Mark A. Correll, Deputy Assistant Secretary for Environment, Safety and Infrastructure

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