

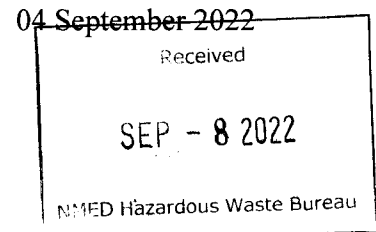


ENTERED

DEPARTMENT OF THE AIR FORCE
377TH AIR BASE WING (AFGSC)



Colonel Jason F. Vattioni, USAF
Commander
377th Air Base Wing
2000 Wyoming Blvd SE
Kirtland Air Force Base NM 87117



Mr. Rick Shean
Hazardous Waste Bureau (HWB) Chief
New Mexico Environment Department (NMED)
2905 Rodeo Park Drive East Building 1
Santa Fe NM 87505-6303

Dear Mr. Shean

This letter is in response to the New Mexico Environment Department letter titled *Soil Vapor Sampling Modifications Bulk Fuels Facility Spill Site NM9570024423, HWB-KAFB-20-008* dated August 31, 2021, and subsequent NMED e-mail dated September 24, 2021, requiring modifications to soil vapor sampling associated with the site. The August 2021 letter and September 2021 e-mail requirements would significantly change the sampling methodology and include additional site characterization associated with the soil vapor monitoring program currently employed at the site. The Air Force currently executes soil sampling activities in accordance with the NMED-approved February 2018 work plan, *Work Plan for Vadose Zone Coring, Vapor Monitoring, and Water Supply Sampling Bulk Fuels Facility Solid Waste Management Units ST-106/SS-111* (2018 work plan). The methodology described within the 2018 work plan is based on a January 20, 2015, Technical Working Group, in which NMED, Air Force, and project stakeholders agreed upon the methodology. The methodology was selected to ensure the collection of representative soil vapor samples by addressing site specific conditions and following industry standards.

Accordingly, on October 5th, 2021, a discussion occurred between NMED's acting director of the Resource Protection Division and Kirtland's Installation Support Section chief regarding the required modifications to the soil vapor sampling methodology. The Air Force documented the conversation in an email to the acting director of the Resource Protection Division and requested NMED issue a supplemental letter regarding these modifications. The Air Force has not received a formal response.

Pursuant to the requirements of the Kirtland Air Force Base Resource Conservation and Recovery Act Permit # NM9570024423 Parts 6.2.2.1, 6.2.2.1.1, and 6.5.16, the Air Force shall perform site investigations only in accordance with an approved work plan. Additional characterization required by NMED not already covered under an existing approved work plan requires an approved supplemental work plan, and the method used to obtain soil vapor data

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must be approved by NMED in writing prior to the start of monitoring. Therefore, the Air Force respectfully asks NMED to send the Air Force a supplemental work plan request outlining all the required modifications NMED wants the Air Force to make to the 2018 work plan. The Air Force will then draft a supplemental work plan and submit it for NMED's review and approval. Once NMED approves the supplemental work plan, the Air Force will implement it. Following these steps will ensure compliance with the permit, completeness of the administrative record, adherence to industry standards, and transparency for our stakeholders regarding the methodology employed at the site. All data gathered under the NMED-approved 2018 work plan will remain valid and useful for informing remediation decisions even after NMED approves a supplemental work plan.

If you have any questions or concerns, please contact Mr. Ryan Wortman at commercial line 505-980-6121 or email ryan.wortman.3@us.af.mil.

Sincerely

VATTIONI.JASO
N.F.1170028640
JASON F. VATTIONI, Colonel, USAF
Commander

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cc:

NMED Resource Protection Division (Catechis)
NMED HWB (Shean, Andress)
NMED-HWB (Cobrain, Wear)
EPA Region 6 (King, Mckinney)
AFCEC/CZ (Clark, Kottkamp, Segura)
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