



From: [Cobrain, Dave, ENV](#)
To: [WORTMAN, RYAN J GS-13 USAF AFCEC AFCEC/CZO](#); [Wear, Benjamin, ENV](#)
Cc: [Shean, Rick, ENV](#); [Andress, Lane, ENV](#); [SEGURA, CHRISTOPHER G GS-14 USAF AFCEC/CZO](#)
Subject: RE: [EXTERNAL] Kirtland AFB Bulk Fuels Facility Inquiries
Date: Sunday, September 25, 2022 3:26:58 PM

Ryan,

The specific requirements included in NMED's September 16, 2022 letter regarding a soil vapor monitoring work plan confirm the sampling method requirements listed in NMED's August 31, 2021 letter. The August 31, 2021 letter was issued after the Air Force submittal of any work plans related to soil vapor sampling; therefore, it supersedes methods proposed in work plans submitted to NMED previous to that date. Also, please submit a well-specific vapor sampling schedule with your 15-day notification required by Permit Section 6.1.2 for the fourth quarter sampling event so that NMED can coordinate sampling at selected wells.

Thanks.

Dave

Dave Cobrain
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-----Original Message-----

From: WORTMAN, RYAN J GS-13 USAF AFCEC AFCEC/CZO <ryan.wortman.3@us.af.mil>
Sent: Friday, September 23, 2022 3:12 PM
To: [Wear, Benjamin, ENV <Benjamin.Wear@state.nm.us>](mailto:Benjamin.Wear@state.nm.us)
Cc: [Shean, Rick, ENV <Rick.Shean@state.nm.us>](mailto:Rick.Shean@state.nm.us); [Andress, Lane, ENV <Lane.Andress@state.nm.us>](mailto:Lane.Andress@state.nm.us); [Cobrain, Dave, ENV <dave.cobrain@state.nm.us>](mailto:dave.cobrain@state.nm.us); [SEGURA, CHRISTOPHER G GS-14 USAF AFCEC/CZO <christopher.segura.2@us.af.mil>](mailto:christopher.segura.2@us.af.mil)
Subject: FW: [EXTERNAL] Kirtland AFB Bulk Fuels Facility Inquiries

Hi Ben,

Thanks for responding to my inquires and providing regulatory direction. It is understood that NMED does not want to discuss the shallow soil vapor data outside of a final report. This is a deviation from the Work Plan for Shallow Soil Vapor Monitoring October 2, 2021, NMED Approval Letter, see attached. The letter states, "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." The final Shallow Soil Vapor Monitoring Investigation Report will document this deviation from the work plan approval letter and use this email correspondents as justification for that deviation.

Based on the RCRA Permit Parts # 6.2.2.1, 6.2.2.1.1, and 6.5.16, the Air Force will plan to follow NMED approved Work Plans for soil vapor data collection at this time. Any modifications to the current approved methodology will be implemented following NMED's approval of the Soil Vapor

KAFB5256



Sampling Work Plan required to be submitted no later than March 1, 2023, see attached NMED September 16, 2022, letter requiring said work plan.

From my understanding of your email, NMED's perspective is that by not following August 31, 2021, letter requirements for the Shallow Soil Vapor Investigation makes that data unrepresentative. However, the Shallow Soil Vapor Work Plan methodology was approved on October 2, 2021, after the August 31, 2021, letter was submitted. These two regulatory correspondents direct the Permittee to collect samples using two different purge volumes and analytical suites. From NMED's perspective does the August 31st, 2021, letter's requirements supersede the subsequent October 2, 2021, Shallow Soil Vapor Work Plan approval letter?

Thanks,

RYAN J. WORTMAN, GS-13
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-----Original Message-----

From: Wear, Benjamin, ENV <Benjamin.Wear@state.nm.us>
Sent: Wednesday, September 21, 2022 3:46 PM
To: WORTMAN, RYAN J GS-13 USAF AFCEC AFCEC/CZO <ryan.wortman.3@us.af.mil>
Cc: Shean, Rick, ENV <Rick.Shean@state.nm.us>; Cobrain, Dave, ENV <dave.cobrain@state.nm.us>; Andress, Lane, ENV <Lane.Andress@state.nm.us>
Subject: [Non-DoD Source] RE: [EXTERNAL] Kirtland AFB Bulk Fuels Facility Inquiries

Hi Ryan,

The attached email was forwarded to me, so I am responding. Please include me on all future KAFB correspondence.

Regarding soil vapor sampling, NMED's August 31, 2021 Soil Vapor Sampling Program Modifications letter specifically stated, "[t]he Permittee must purge three well volumes from each monitoring well prior to collection of soil gas samples for all future sampling events" and "[t]he Permittee must resume analyses for TPH fractions in the next soil vapor monitoring event". In addition, NMED's September 24, 2021 email regarding soil vapor sampling specifically stated, "[t]he requirements of NMED's August 31, 2021 letter, as well as the requirements in the email, must be met for the upcoming and future sampling events."

Based on the understanding that the Permittee did not follow NMED direction for either of the shallow soil vapor sampling events, did not follow the requirements of KAFB Permit section 6.5.16, Requirements for Soil-Vapor Monitoring, continued the practice of purging less than one purge volume prior to sample collection, continued using purge and sample collection flow rates that are over an order of magnitude higher than EPA recommendations, and failed to collect samples for TPH fractions, the data is not considered representative of subsurface conditions and cannot be used for any decision-making purposes, including for risk assessment. In addition, investigation is ongoing at the Bulk Fuels Facility Spill (BFFS) site; therefore, a risk assessment cannot be completed at this time. Risk is calculated as cumulative risk for all media and cannot be evaluated in

isolation from other media.

Also, NMED is unable to evaluate data outside of a complete report. The Permittee can submit a complete report to NMED if they feel it is warranted. Based on the information detailed above, the soil vapor samples were not collected appropriately and cannot be considered representative of subsurface conditions. In addition, the shallow soil vapor monitoring locations do not address the potential for vapor intrusion near the VA Hospital or the Siesta Hills neighborhood north of Ridgecrest.

Regarding the public meeting, NMED will notify the Permittee if it is interested in participating/presenting at the public meeting.

Regarding the extension request, prior to 2021, the Permittee demonstrated that it could meet the approved schedule for submitting quarterly reports. In addition, the required format changes referred to in the request were instituted in 2021. Based on this, NMED has determined that just cause do not exist for a blanket extension for submittal of all quarterly reports.

To address the stated issue of the larger dataset when soil vapor data is provided, the Permittee may instead propose to provide a separate semi-annual report that summarizes the results of soil vapor sampling to reduce the data set size for the second and fourth quarter groundwater monitoring reports. The soil vapor monitoring reports would have to be provided within 90-days after the end of each sampling quarter and in accordance with NMED's guidance document General Reporting Guidelines for Corrective Action Documents (8-2020). The initial soil vapor monitoring report summarizing the results of the fourth quarter 2022 soil vapor monitoring could be provided in 120 days to allow for generation of the report template.

Let me know if you have any questions.

Thanks,

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-----Original Message-----

From: Shean, Rick, ENV <Rick.Shean@state.nm.us>
Sent: Friday, September 16, 2022 9:57 AM
To: Cobrain, Dave, ENV <dave.cobrain@state.nm.us>; Wear, Benjamin, ENV <Benjamin.Wear@state.nm.us>
Subject: FW: [EXTERNAL] Kirtland AFB Bulk Fuels Facility Inquiries

FYI

-----Original Message-----

From: WORTMAN, RYAN J GS-13 USAF AFCEC AFCEC/CZO <ryan.wortman.3@us.af.mil>
Sent: Friday, September 16, 2022 9:24 AM
To: Shean, Rick, ENV <Rick.Shean@state.nm.us>; Address, Lane, ENV <Lane.Address@state.nm.us>

Subject: [EXTERNAL] Kirtland AFB Bulk Fuels Facility Inquiries

Hi Lane and Rick,

I wanted to reach out and touch base on a few Kirtland Bulk Fuels Facility Restoration Site topics/questions. First, we collected our second round of the shallow soil vapor data the week of August 8th. We will have validated data back by late October and per the approved shallow soil vapor work plan, "After both the summer and winter sampling events are completed and when the final validated data is received from the sampling events, the Air Force will reach out to NMED to discuss the final data and determine the path forward for the shallow soil vapor investigation." This discussion of the validated data, as the work plan describes, will allow the Final Investigation Report to document the path forward determined at the meeting. In addition, this meeting could determine how the data can be utilized to update the 2018 Risk Assessment for the site. Is NMED willing to have this meeting in late October/early November timeframe? If so, please let me know your availability and I would love to get something on the calendar. Once a date is established I will work to get you all the validated data in a searchable format one week prior to the meeting.

Secondly, we are in beginning the preparations for the November Public Meeting for the Bulk Fuels Facility Restoration Site. Currently, the tentative date is Wednesday November 2, 2022 at 6pm at the Veterans Memorial Campus on Gibson and Louisiana. Our goal is to have this meeting in-person with the option to join virtually, but will make the final determination on that closer to the meeting date. Please let us know if NMED is interested in participating/presenting at the public meeting.

Thirdly, I was hoping to get a status update on NMED's response to our extension request for the Quarterly Monitoring Reports. Lane, I know you have been looking into this, but since we are currently drafting Quarterly Monitoring Reports, I wanted to reiterate that any input from NMED on this topic will be useful for the scheduling/internal reviews of these documents. I have attached the extension request for your reference.

Thanks for your time and hope you all have a great weekend,

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