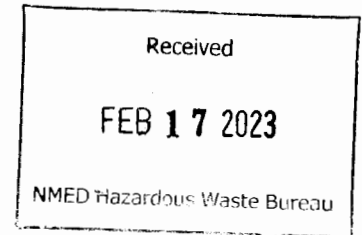




**DEPARTMENT OF THE AIR FORCE  
377TH AIR BASE WING (AFGSC)**



15 February 2023

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

On May 24, 2022, the New Mexico Environment Department Hazardous Waste Bureau (NMED HWB) issued an approval for an extension of time to submit the Phase II Resource Recovery and Conservation Act (RCRA) Facility Investigation (RFI) Work Plan to NMED HWB no later than March 3, 2023. The Air Force has been working to prepare the Phase II RFI Work Plan for submission to the NMED HWB by March 3, 2023; however, at present there are several unresolved technical and administrative issues, and the Air Force has not received sufficient regulatory direction from the NMED HWB to allow the completion of the RFI Phase II Work Plan. As discussed in this letter, several Air Force documents cannot be finalized without NMED approval, and recently NMED issued a Notice of Disapproval (NOD) challenging the results from multiple years of sampling at Kirtland Air Force Base (AFB). As a result of these unresolved issues, Kirtland AFB respectfully request an indefinite extension to the Phase II RFI Work Plan for the Bulk Fuels Facility release site (Solid Waste Management Units ST-106 and SS-111) until regulatory reviews of Air Force submittals are complete, and direction is received to advance the project to the RFI Phase II.

The Air Force has voiced interest in meeting with NMED HWB to discuss expectations regarding the Phase II RFI Work Plan and determine a path forward for the project to conclude the investigation phase. At the Groundwater Treatment System Open House in July 2021, NMED announced that the investigation phase of the project was nearing an end. Based on this announcement the Air Force secured funds and awarded a contract to develop the Phase II RFI Work Plan and subsequent report. To date, the Air Force has not received a response from NMED HWB regarding the referenced meeting request or a response on the project documents that are intended to characterize the data gaps identified in the Phase I RFI Report.

The critical site characterization documents that address the Phase I RFI Report data gaps include the Source Zone Characterization Report submitted on April 19, 2021, and the Investigation Report for Data Gap Monitoring Well Installation KAFB-106248

KAFB5268



to KAFB-106252 and KAFB106S10 submitted on October 12, 2021. NMED's review and subsequent comments on and approval of these documents are critical for the Air Force to begin work on the RFI Phase II Work Plan. The Air Force first requested direction from the NMED HWB on requirements for RFI Phase II Work Plan via an email sent on December 10, 2021. Follow up emails were sent on January 7, 2022, March 2, 2022, April 28, 2022, September 20, 2022, and October 17, 2022. These email correspondences are provided as an attachment to this letter for your convenience. In NMED HWB responses to the Air Force's December 10, 2021, and March 2, 2022, emails, NMED HWB indicated that the department was still reviewing project documents and would as promptly as possible provide guidance regarding the Phase II RFI Work Plan.

Additionally, NMED issued a NOD to the Air Force on November 8, 2022, on the *Work Plan for Groundwater Monitoring*, dated April 2021, regarding groundwater sample collection and data reporting. NMED also issued several correspondences that required changes to the NMED-approved soil vapor monitoring methodologies. In these correspondences, NMED rescinds previous approvals and states that eight years of soil vapor data and five years of groundwater data collected via passive sampling technologies are not representative of site conditions. The permittee relies on the regulatory direction to meet the intent of the State's RCRA permit. Rescinding approvals and changing guidance is detrimental to the Air Force's ability to plan, program, budget, and execute. NMED's direction on how to handle these data sets regarding the RFI Phase II is critical given data collected was performed pursuant to the NMED-approved work plans.

The Air Force doesn't have sufficient and clear guidance to develop the RFI Phase II Work Plan and NMED's recent correspondences rescinding previous NMED approvals and decisions, the Air Force is required to request an indefinite extension for the submission of the Phase II RFI Work Plan. Additionally, the Air Force is respectfully requesting a meeting to discuss the technical path forward to the RFI Phase II Work Plan and subsequent report.

If you have any questions or concerns, please contact Mr. Ryan Wortman at the commercial line (505) 853-3484 or email [ryan.wortman.3@us.af.mil](mailto:ryan.wortman.3@us.af.mil).

Sincerely

VATTIONI.JASO Digitally signed by  
VATTIONI.JASON.F.117002864  
N.F.117002864 0  
Date: 2023.02.15 11:16:11 -0700  
JASON F. VATTIONI, Colonel, USAF  
Commander

1 Attachment:  
Emails regarding the RFI Phase II Work Plan

cc:  
NMED (Gilliam), letter, and 1 CD

**NMED Resource Protection Division (Catechis), letter, and 1 CD**  
**NMED HWB (Shean, Andress, Cobrain, Wear), 2 Hard Copies and 2 CDs**  
**AFCEC/CZ (Wortman Kottkamp, Segura), electronic only**  
**USACE-ABQ District Office (Moayyad, Watts-Gravette, Phaneuf, Earthman, Dreeland),  
electronic only**  
**Public Information Repository, Administrative Record/Information Repository (AR/IR), and File**

**From:** [WORTMAN, RYAN J GS-13 USAF AFCEC AFCEC/CZO](#)  
**To:** [Shean, Rick, NMENV](#)  
**Cc:** [lane.andress@state.nm.us](#); [Cobrain, Dave, NMENV](#); [Wear, Benjamin, NMENV](#); [KOTTKAMP, SHEEN T GS-13 USAF AFCEC AFCEC/CZOW](#); [SEGURA, CHRISTOPHER G GS-14 USAF AFCEC/CZO](#)  
**Subject:** RE: RFI Phase II Work Plan Requirements  
**Date:** Monday, October 17, 2022 3:48:00 PM  
**Attachments:** [RFI Phase II WP Schedule.09.19.22.pdf](#)  
[RE Follow-up to BFF Key Project Aspects that Require Additional Discussion \(70.9 KB\).msg](#)  
[RE EXTERNAL RE Kirtland AFB BFF Release Key Project Aspects that Req... \(43.9 KB\).msg](#)

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Good Afternoon,

I am sending this email to follow up on the Air Force request for a RFI Phase II Work Plan requirements meeting, see email below. We continue to await direction on the RFI Phase II Work Plan requirements and can accommodate NMED's schedule to set up a meeting. At this point we will need to submit an extension request for the Phase II Work Plan because we will not be able to meet the March 3rd, 2023 deadline. Can you provide me an estimated timeframe as to when the Air Force can receive direction on the Phase II Work Plan? That information will allow us to ask for a realistic extension on this requirement.

Thanks,

RYAN J. WORTMAN, GS-13  
Physical Scientist, Kirtland Installation Support Section  
Air Force Civil Engineer Center  
Comm (505) 853-3484  
Mobile (505) 980-6121

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

From: WORTMAN, RYAN J GS-13 USAF AFCEC AFCEC/CZO

Sent: Tuesday, September 20, 2022 9:58 AM

To: Shean, Rick, NMENV <Rick.Shean@state.nm.us>

Cc: lane.andress@state.nm.us

Subject: RFI Phase II Work Plan Requirements

Hi Rick,

The RFI Phase II contract for the BFF project has been recently awarded. Please see attached RFI Phase II Work Plan schedule and our previous emails regarding the RFI Phase II Work Plan topic. Currently we have a regulatory deadline to submit a RFI Phase II Work Plan by March 03, 2023. The attached schedule shows that in order to meet that regulatory due date we need direction from NMED indicating what you would like to see in the document. If NMED provides input on the RFI Phase II Work Plan requirements by October 7, 2022, then we can meet the regulatory deadline. If we receive input later than that date there will likely need to be an extension request.

For context on the type of regulatory direction we are requesting, please see the attached emails previously discussing this topic. Would NMED be interested in having a meeting to discuss the RFI Phase II Work Plan requirements with the Air Force before or around the date of October 7, 2022? Please let me know if you need any additional background information on this topic or support from me in developing a list of requirements for this work plan.

Thanks,

RYAN J. WORTMAN, GS-13  
Physical Scientist, Kirtland Installation Support Section  
Air Force Civil Engineer Center  
Comm (505) 853-3484  
Mobile (505) 980-6121

**From:** [WORTMAN, RYAN J GS-13 USAF AFCEC AFCEC/CZO](#)  
**To:** [Shean, Rick, NMENV](#)  
**Cc:** [SEGURA, CHRISTOPHER G GS-14 USAF AFCEC/CZO](#); [Catechis, Chris, NMENV](#); [Andress, Lane, NMENV](#)  
**Subject:** RE: Follow-up to BFF Key Project Aspects that Require Additional Discussion  
**Date:** Thursday, April 28, 2022 8:45:48 AM  
**Attachments:** [RE EXTERNAL RE Kirtland AFB BFF Release Key Project Aspects that Req... \(43.9 KB\).msg](#)

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Good Morning Rick,

I wanted to reach out to follow-up on the email from January 7th, 2022, titled, "Key Project Aspects that Require Additional Direction", see attached. Specifically item number two from the attached email. The Air Force is reaching out to receive additional direction concerning the RFI Phase II Work Plan and remaining regulatory requirements to get to the Corrective Measures Evaluation (CME). We are submitting an extension request for the RFI Phase II Work Plan this week that moves the due date for the document to November 28th, 2022. However, we are also developing a new contract that will cover the RFI Phase II Work Plan/Report, updating the risk assessment with the shallow soil vapor data, and any other regulatory requirements that NMED deems necessary to get to the CME. In order to award this contract in this fiscal year we need a refined scope by May 20th, 2022.

In the attached email correspondents you indicated that the RFI Phase II WP may require some additional investigation activities based on NMED's review of recently submitted document. In order to perform these potential investigations in a timely manner, the Air Force would like to include these tasks under the contract that is in development. Would NMED be open to meeting with the Air Force before May 20th, 2022 to outline the additional investigation steps that may be required, so the Air Force can capture these tasks on the upcoming contract? These tasks will be placed in as optional and won't be initiated until we have received official regulatory direction. If we are unable to have this discussion at this time, my concern is that we will not be able to meet regulatory requirements in a timely manner due to having to set up an additional contract in order to reach the CME. This meeting could mitigate significant delays on this project moving forward.

Please let me know if NMED is interested in meeting before May 20th, 2022 and I will set up a teleconference.

Thanks,

RYAN J. WORTMAN, GS-13

Physical Scientist, Kirtland Installation Support Section

Air Force Civil Engineer Center

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Mobile (505) 980-6121

**From:** [Shean, Rick, NMENV](#)  
**To:** [WORTMAN, RYAN J GS-13 USAF AFCEC AFCEC/CZO](#)  
**Cc:** [SEGURA, CHRISTOPHER G GS-14 USAF AFCEC/CZO](#); [Catechis, Chris, NMENV](#); [Andress, Lane, NMENV](#)  
**Subject:** [URL Verdict: Neutral][Non-DoD Source] RE: [EXTERNAL] Follow-up to BFF Key Project Aspects that Require Additional Discussion  
**Date:** Friday, March 4, 2022 4:20:30 PM

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Hello, Ryan:

I'm continuing my efforts to work through staff and senior level to fully address your questions and comments below. I will respond to you as promptly as I possibly can with the guidance you need.

Thank you for following up.

Sincerely,

Rick Shean Bureau Chief

New Mexico Environment Department

Hazardous Waste Bureau

2905 Rodeo Park Drive East Bldg I

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Cell 505-629-6494

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[twitter.com/NMEnvDep](https://twitter.com/NMEnvDep) <<https://twitter.com/NMEnvDep>>

(he, him) Why: <https://www.mypronouns.org/what-and-why> <<https://www.mypronouns.org/what-and-why>>

From: WORTMAN, RYAN J GS-13 USAF AFCEC AFCEC/CZO <[ryan.wortman.3@us.af.mil](mailto:ryan.wortman.3@us.af.mil)>  
Sent: Wednesday, March 2, 2022 3:31 PM  
To: Shean, Rick, NMENV <[Rick.Shean@state.nm.us](mailto:Rick.Shean@state.nm.us)>  
Cc: SEGURA, CHRISTOPHER G GS-14 USAF AFCEC/CZO <[christopher.segura.2@us.af.mil](mailto:christopher.segura.2@us.af.mil)>; Catechis, Chris,

NMENV <Chris.Catechis@state.nm.us>; Address, Lane, NMENV <Lane.Address@state.nm.us>  
Subject: [EXTERNAL] Follow-up to BFF Key Project Aspects that Require Additional Discussion

Good Afternoon Rick,

Hope the legislative session went well for you all last month. This email is a follow-up to emails dated January 12th, 2022 and February 2nd, 2022. The main topics from these emails are the continued discussion of the requirements for the Phase II RFI Work Plan, NMED's potential additional investigation requirements, and the due dates for the Periodic Monitoring Reports. I have also attached these emails for your convenience.

In the January 12th, 2022 email, the Air Force requested we set up a time to discuss the impacts of including additional investigation in the RFI Phase II Work Plan before the Air Force submits an additional extension request. This Work Plan has a due date of May 31st, 2022. If possible, can we set up a time to discuss the RFI Phase II Work Plan requirements in March or early April at the latest?

The Air Force would like to recommend an additional discussion that will cover the specifics of any additional investigation NMED may require before a formal response is finalized for the recently submitted reports, listed below. We can also deep dive the data reliability concerns expressed in NMED's February 15, 2022 letter, regarding the discontinuation of groundwater modeling associated with the pump and treat interim measure.

- \* March 14, 2021– KAFB Ethylene Dibromide In Situ Biodegradation Pilot Test Report Revision 1
- \* April 19, 2021 – KAFB Source Zone Characterization Report BFFS, Revision 1, April 2021
- \* October 12, 2021 - Investigation Report for Data Gap Monitoring Well Installation KAFB-106248 to KAFB-106252 and KAFB-106S10 Bulk Fuels Facility, BFFS, October 2021

This additional discussion will allow us to all get on the same page, in order to close the gap between the high-level negotiation that took place in 2021 and the staff working on moving this project forward today. I know the scheduling of this discussion will have to be contingent on the completion of NMED's review of recently submitted documents. In addition before this discussion takes place could you please provide some additional information on the following topics:

- \* A general timeframe of when this discussion could take place (anticipated timeframe for review completion of recently submitted reports),
- \* specifics on the additional investigation needed, and
- \* specifics on the data reliability issue

This information will allow me to coordinate with the Air Force folks to ensure we have the technical support needed to deep dive these topics.



Finally, as a follow-up to the February 2nd, 2022 email, regarding the extension requests for the periodic monitoring reports. Unless otherwise directed, the Air Force will plan to submit a Periodic Monitoring Reports Extension Request similar to the extension request already submitted on May 6th, 2021, see a copy of this request attached to the February 2nd, 2022 email, asking for an extension for all future periodic monitoring reports. Please let me know if NMED has any concerns with that path forward.

Thanks,

RYAN J. WORTMAN, GS-13

Physical Scientist, Kirtland Installation Support Section

Air Force Civil Engineer Center

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**From:** WORTMAN, RYAN J GS-13 USAF AFCEC AFCEC/CZO  
**To:** Shean, Rick, NMENV  
**Cc:** SEGURA, CHRISTOPHER G GS-14 USAF AFCEC/CZO; Catechis, Chris, NMENV  
**Subject:** RE: [EXTERNAL] RE: Kirtland AFB BFF Release Key Project Aspects that Require Additional Direction  
**Date:** Friday, January 7, 2022 11:03:42 AM

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Hi Rick,

Hope you enjoyed the January 5th, Groundwater Treatment System Tour for the Bulk Fuels Facility (BFF). It was great to go over some of the general project aspects with you and Chris in person. Thanks for additional clarification on some of the key project aspects. There are discussions I would like to have regarding these items, specifically the RFI Phase II Work Plan. Can we set up a time to discuss the high level impacts of including additional investigation in the RFI Phase II Work Plan before an extension request is submitted?

Please see my responses below:

1. Understood that NMED will not be commenting on the meeting summary. Our path forward for this Technical Working Group (TWG) summary will be to post this summary to our project websites and discuss summary in the next monthly stakeholder meeting. Currently, the plan for the next TWG topic is a continued discussion on groundwater monitoring and optimization. We will communicate at the next Stakeholder meeting that the next TWG will be scheduled after we have received comments from NMED on the April 2021, Groundwater Monitoring Work Plan (GWM WP). Once, comments are received I would like to work with you to develop agenda items that can help facilitate the development of an update to the April 2021, GWM WP. Without NMED's involvement in planning and more active participation in a follow-up TWG the Air Force does not see utility in continuing to hold TWGs at this time.

2. I am concerned about including additional investigation under the RFI Phase II Work Plan title. If NMED directs the Air Force to perform additional investigations under the RFI Phase II Work Plan, that contradicts NMED's statement that the investigation phase of the project is ending and agreements made during negotiations between Secretary Kenny and Mr. Correll held in 2021. My understanding is that in the 2021 negotiations NMED and the Air Force agreed that the nature and extent of contamination at this site has been delineated to the degree necessary to perform the CME. Both NMED and the Air Force have made this statement to the public, following the 2021 negotiations.

Including additional investigation in a RFI Phase II Work Plan makes the statement to our stakeholders and the public that we do not understand the nature and extent of contamination at the site and we are not ready to develop the RFI Phase II Report or the Corrective Measures Evaluation (CME). There will also be significant impacts to the overall project schedule, pushing out the RFI Phase II Report and CME multiple years.

The Air Force is confident that we can compile the data from the additional investigations performed since the RFI Phase I Report and the most recent periodic monitoring data to delineate the nature and extent of contamination in the RFI Phase II Report to the degree necessary to inform the CME. I am curious to see what additional data NMED would like before proceeding to the RFI Phase II Report and look forward to NMED's responses to the submitted

investigation reports.

If NMED determines additional data needs from your review of these investigation reports or at any time as we progress towards the CME, the Air Force is committed to evaluating these determinations and collecting additional data as needed. There are other avenues we can proceed to collect additional data outside an RFI Phase II Work Plan:

- \* Similar to how the Shallow Soil Vapor Work Plan data will be used, if data is needed to ensure the protection of human health and the environment, the Air Force can develop a standalone work plan to address this situation. This data can be used to update the Risk Assessment, which we plan to develop before the CME and after the Shallow Soil Vapor Data is collected and evaluated.

- \* Throughout the RCRA process there will likely be additional data gaps created by changing site conditions over time, for example the rising water table. The Air Force is committed to addressing these data gaps as we move through the RCRA process and the installation of 21 shallow groundwater monitoring wells since the identification of the rising water table data gap in the RFI Phase I Report is a testament to that. At this time the rising water table and changing site conditions are not impacting our understanding of the site in a way that would not allow us to develop the RFI Phase II Report and the CME. Work Plans can be developed to confirm our understanding of the site throughout the corrective action process.

- \* The CME can be another place to call for additional data. It is very likely that the CME will include the installation and collection of additional monitoring points in order to effectively assess the performance of the selected remedial design. In addition, the CME will also have to address data gaps created by changing site conditions over time between the RFI Phase II Report and the development of the CME.

3. The Air Force will hold off on delivering an updated Groundwater Monitoring Work Plan (GWM WP) until comments on the April 2021 GWM WP are received. Once comments are received the Air Force will plan to incorporate these comments along with updates discussed in the October 2021 TWG and submit updated GWM WP for NMED's review. Could you provide us with an estimated date as to when we should expect comments on the April 2021 GWM WP?

Thanks and hope you have a good weekend,

RYAN J. WORTMAN, GS-13

Physical Scientist, Kirtland Installation Support Section

Air Force Civil Engineer Center

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From: Shean, Rick, NMENV <Rick.Shean@state.nm.us>  
Sent: Tuesday, January 4, 2022 3:15 PM  
To: WORTMAN, RYAN J GS-13 USAF AFCEC AFCEC/CZO <ryan.wortman.3@us.af.mil>  
Cc: SEGURA, CHRISTOPHER G GS-14 USAF AFCEC/CZO <christopher.segura.2@us.af.mil>; Catechis, Chris, NMENV <Chris.Catechis@state.nm.us>  
Subject: [URL Verdict: Neutral][Non-DoD Source] RE: [EXTERNAL] RE: Kirtland AFB BFF Release Key Project Aspects that Require Additional Direction

Hello, Ryan:

Thanks for checking in on these topics. I've met with my staff and they have made me aware of the number of NMED responses that are still outstanding and that could answer a few of the questions, so I am making it a priority to get them out to you as soon as possible. With that said, below are responses for your first three bullets. Chris and I will speak to you more about the fourth bullet during the site visit tomorrow.

1. This Oct. 2021 TWG discussed changes to the groundwater monitoring program at the site. The Air Force had previously submitted a Groundwater Monitoring Work Plan to NMED on April 26, 2021. At the time of the TWG, the work plan was, and still is, under review with NMED HWB. As a result, NMED did not comment during the TWG meeting and cannot comment on the TWG attachments provided. In addition, NMED HWB does review or approve meeting notes as a policy. For more information regarding groundwater sampling at the site see the response to the third bullet below.
2. NMED currently has several KAFB BFFS investigation and quarterly monitoring reports in review. At this time, it cannot be determined what additional work, if any, will be required for inclusion into the Phase II RFI Work Plan until NMED has completed these reviews. Therefore, the Air Force is encouraged to request an extension for the Phase II RFI Work Plan. This will allow for NMED to finish its reviews to determine the appropriate content for the next RFI Work Plan at that time.
3. NMED is currently in the final stages of reviewing the Groundwater Monitoring Work Plan which was submitted to NMED on April 26, 2021. The requirements of the NMED's letter call for annual updates to the Groundwater Monitoring Work Plan, to be due in April each year. As the submitted Work Plan has not yet been approved by NMED, the update to the work plan is hereby waived for 2022. The Air Force must not submit a revised work plan for groundwater monitoring until NMED issues comments on the originally submitted work plan. The revised work plan must incorporate NMED's comments.

Sincerely,

Rick

Rick Shean Bureau Chief

New Mexico Environment Department

Hazardous Waste Bureau

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(he, him) Why: <https://www.mypronouns.org/what-and-why> <<https://www.mypronouns.org/what-and-why>>

From: WORTMAN, RYAN J GS-13 USAF AFCEC AFCEC/CZO <[ryan.wortman.3@us.af.mil](mailto:ryan.wortman.3@us.af.mil)  
<<mailto:ryan.wortman.3@us.af.mil>> >  
Sent: Friday, December 10, 2021 12:47 PM  
To: Shean, Rick, NMENV <[Rick.Shean@state.nm.us](mailto:Rick.Shean@state.nm.us) <<mailto:Rick.Shean@state.nm.us>> >  
Cc: SEGURA, CHRISTOPHER G GS-14 USAF AFCEC/CZO <[christopher.segura.2@us.af.mil](mailto:christopher.segura.2@us.af.mil)  
<<mailto:christopher.segura.2@us.af.mil>> >; Catechis, Chris, NMENV <[Chris.Catechis@state.nm.us](mailto:Chris.Catechis@state.nm.us)  
<<mailto:Chris.Catechis@state.nm.us>> >  
Subject: [EXTERNAL] RE: Kirtland AFB BFF Release Key Project Aspects that Require Additional Direction

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Hi Rick,

Hope you had a good Thanksgiving! Below is a bulleted list of some of the key project aspects that requires NMED's attention. I wanted to get this email over to you before the Holidays and 2022. NMED's direction and guidance on these topics, listed below, is critical for the Air Force to satisfy regulatory due dates and deliverer high quality documents that meet NMED's expectations. Please reach out to me if you would like to discuss any of these points in more detail or if you have any questions. I am not planning on taking any leave for the rest of the year, so I can make any time work. I appreciate your input and believe additional direction and guidance on these items will help the Air Force produce acceptable documents for NMED's review.

\* Technical Working Group (TWG) Meeting Summary: For the October 21st, 2021 TWG Meeting we have received comments from TWG participants, predominantly from the ABCWUA, on the meeting summary and produced the attached meeting summary in response to those comments. In 2021, multiple TWG planning meetings with NMED and stakeholders were held to develop ground rules for the reimplementation of TWGs. In accordance with the TWG ground rules, a TWG summary will be posted to AF/NMED administrative record 30 days after the TWG. For the October 21st 2021, meeting summary. I would like to get this uploaded by the end of the year, so it would be great to get NMED's input on the attached meeting summary. We encourage review of the entire document, but for convenience we have organized the meeting minutes to place the recommendations front and center for your review and titled the columns, "Air Force Path Forward for NMED Consideration". These list out

how the Air Force plans to address concerns raised during the TWG. We can also set up a teleconference to discuss summary in detail any time before the end of the year.

\* Phase II RCRA Facility Investigation (RFI) Work Plan: In the September 25th, 2019 approval of the Phase I RFI NMED requested a Phase II RFI Work Plan. The Air Force requested an extension on this approval in April 2021 letter, until a mutual agreement could be made on a path forward. NMED moved the regulatory due date for the Work Plan to May 31st, 2022. The Air Force is requesting direction on the content of the Phase II Work Plan, since Investigation Work Plans to address data gaps identified in the Phase I RFI have already been submitted under two different deliverables titled Data Gap Investigation Work Plan and Source Area Characterization Work Plan. Is the intent of this Work Plan requirement to produce an annotated outline the Phase II RFI Report? To meet this regulatory due date, the Air Force is respectfully requesting a teleconference regarding the Phase II RFI Work Plan by January 21st, 2022. If additional direction is not received by this date, the Air Force will plan to produce an annotated outline for the RFI Phase II Report to meet the Work Plan requirement.

\* Groundwater Monitoring Work Plan: In April 2021, a consolidated Groundwater Monitoring Work Plan was submitted to NMED to meet the requirements of NMED's October 2nd, 2020 letter. To date we have not received any comments or approval on this work plan. This letter also requires an annual update every April. The Air Force is planning to submit a GWM Work Plan update in April 2022, but is wondering the status of the review of the April 2021 Work Plan as we move forward. In addition, it would be great to have NMED's input on how they would like the Groundwater Monitoring Work Plan update formatted. Currently, we are working towards producing an updated work plan and will include a redline-strikeout between the 2021 and 2022 versions of the Work Plan to help with your review. Getting NMED's input on this updated work plan by January 21st, 2022, will help facilitate the production of an acceptable document.

\* Soil Vapor Clarification: On August 31st, 2021, NMED sent a letter requesting modifications to the soil vapor sampling program and on September 24th, 2021, we received additional direction from NMED via email. These modifications require significant changes from the approved NMED Work Plans outlining soil vapor sampling activities at the site. Periodic soil vapor sampling is being performed under the NMED approved 2018 Work Plan for Vadose Zone Coring, Vapor Monitoring, and Water Supply Sampling and we are gearing up to perform the Shallow Soil Vapor Investigation, performed in accordance with the Work Plan for Shallow Soil Vapor Installation; approved on October 3rd, 2021. The Air Force requests that we wait to implement any modifications to the soil vapor sampling methodology until the summer and winter sampling events can be completed under the Shallow Soil Vapor Sampling Work Plan. In addition, the Air Force requests that any modification to soil vapor be documented in a Work Plan or Work Plan Modification and no sampling changes are made until we have an NMED approval on said work plan that outlines the modified sampling procedures. In a phone conversation with Chris Catechis, the Air Force received direction to hold off on incorporating these modifications until NMED submits a clarification letter. Let me know if you would like to discuss this item in more detail or if there is a status updated the clarification letter.

Thanks,

RYAN J. WORTMAN, GS-13

Physical Scientist, Kirtland Installation Support Section

Air Force Civil Engineer Center

**Comm (505) 853-3484**

**Mobile (505) 980-6121**