



MICHELLE LUJAN GRISHAM
GOVERNOR



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Certified Mail - Return Receipt Requested

February 27, 2023

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

Ms. Melissa Clark
Civil Engineer Office
377 MSG/CEIE
2050 Wyoming Blvd SE
Kirtland AFB, NM 87117

**RE: APPROVAL OF THE THIRD EXTENSION REQUEST FOR SUBMITTAL OF THE
PHASE II RESOURCE CONSERVATION AND RECOVERY ACT FACILITY INVESTIGATION
(RFI) WORK PLAN AND
REQUIREMENT FOR MIGRATION PATHWAY INVESTIGATION 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-MISC**

Dear Colonel Vattioni and Ms. Clark:

The New Mexico Environment Department (NMED) is in receipt of the Kirtland Air Force Base (Permittee) *Indefinite Extension of Time Request for the Phase II Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Work Plan, Bulk Fuels Facility, Solid Waste Management Units ST-106/SS-111 (Work Plan)*, dated February 15, 2023 and received on February 16, 2023.

The Request states, "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[s] 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."

In previous communications the Permittee has indicated that the scope of a Phase II RFI Report would be a compilation of data from reports already received by NMED. A compilation report

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Hazardous Waste Bureau - 2905 Rodeo Park Drive East, Building 1, Santa Fe, New Mex
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KAFB5272



Col. Vattioni and Ms. Clark

February 27, 2023

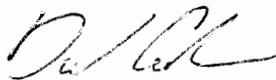
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is not necessary since NMED has previously received the information in other submittals. Therefore, NMED hereby grants the indefinite extension for the Phase II RFI Work Plan.

In addition, the Permittee states “[t]he 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 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.” NMED is preparing the responses for these two documents. Due to remaining data gaps at the site identified in these documents, the Permittee must submit a work plan to investigate the LNAPL migration pathway from the area of the fuel release to the groundwater, which historical site investigation data strongly suggests is east and southeast of the location of the former fuel offloading racks (FFOR) and associated conveyance piping. The Migration Pathway Investigation Work Plan must be submitted to NMED no later than **October 2, 2023**.

Should you have any questions regarding these comments, please contact me at (505) 690-5802.

Sincerely,



Dave Cobrain,

Acting Chief

Hazardous Waste Bureau

cc: R. Shean, Director, NMED RPD
B. Wear, NMED HWB
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File: KAFB 2023 Bulk Fuels Facility Spill and Reading