



MICHELLE LUJAN GRISHAM
GOVERNOR



ENTERED

JAMES C. KENNEY
CABINET SECRETARY

Certified Mail - Return Receipt Requested

March 1, 2023

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

Melissa Clark
377 MSG/CEIE
2050 Wyoming Blvd SE
Kirtland AFB, NM 87117

**RE: APPROVAL WITH MODIFICATIONS
WORK PLAN FOR WYO-4 AREA OF CONCERN RCRA FACILITY INVESTIGATION,
REVISION 2, SEPTEMBER 2020
KIRTLAND AIR FORCE BASE, NEW MEXICO
EPA ID# NM9570024423
HWB-KAFB-19-013**

Dear Colonel Vattioni and Ms. Clark,

The New Mexico Environment Department (NMED) received the U.S. Air Force (Permittee) Kirtland Air Force Base (Facility) Work Plan for WYO-4 Area of Concern RCRA Facility Investigation, Revision 2, September 2020 (Work Plan) on September 28, 2020. NMED has reviewed the Work Plan and hereby issues this Approval with the following modification:

1. Executive Summary

Permittee Statement: "The proposed investigation consists of installing three groundwater monitoring wells completed in the perched zone near well WYO-4. Three locations and one contingency location are proposed for the wells."

NMED Comment: Similar statements are also made in Sections 4.1 (Monitor Well Installation and Sampling) and 5.2 (Proposed Groundwater and Soil Vapor Monitoring Well Locations and Construction); however, the language following these statements results in ambiguity due to the potential for differing outcomes. For example, in the Executive Summary, after the above quoted text, the Permittee states:

"One well (Location 1, designated as KAFB-WYO-5) will be drilled 50 feet northwest and upgradient of WYO-4 and completed as a groundwater monitoring well screened in the perched groundwater zone and equipped with annular probes to allow collection of soil vapor samples for analyses of volatile organic compounds (VOCs). This location will be screened at the bottom of the perched zone and located in the vicinity of WYO-4. Downgradient groundwater monitoring wells will also be completed in the

SCIENCE | INNOVATION | COLLABORATION | COMPLIANCE

Hazardous Waste Bureau - 2905 Rodeo Park Drive East, Building 1, Santa Fe, New Mex
Telephone (505) 476-6000 - www.env.nm.gov

KAFB5275



Col. Vattioni and Ms. Clark

March 1, 2023

Page 2

perched groundwater zone for collection of groundwater samples only and will not be constructed with annular probes. The second well (KAFB-WYO-6) will be installed 250 feet downgradient from WYO-4. If water is not present in the perched zone of the second well, the alternate location will be used for the third well (KAFB-WYO-7) 250 feet downgradient of WYO-4 and completed as a perched groundwater monitoring well. If well KAFB-WYO-6 or KAFB-WYO-7 do not find perched groundwater, an alternate well (KAFB-WYO-7[alt]) will be drilled approximately 800 feet southeast and downgradient of WYO-4.”

The discussion seems incomplete because it does not state what happens if water is found to be present in KAFB-WYO-6 or KAFB-WYO-7. To clarify, NMED requires that a minimum of three wells be installed for this investigation and concurs with installation of the alternate well should water not be present in either KAFB-WYO-6 or KAFB-WYO-7. No revision is required.

Following installation of the wells, the Permittee must submit a well installation report detailing the installation, findings, and initial sampling results no later than **June 2, 2023**. In addition, the Permittee must submit a groundwater monitoring plan for review no later than **August 1, 2023**. The report and work plan must comply with the KAFB Permit and NMED’s *General Reporting Guidelines for Corrective Action Documents*, which can be found at <https://www-archive.env.nm.gov/hazardous-waste/guidance-documents/>.

This approval is based on the information presented in the document as it relates to the objectives of the work identified by NMED at the time of review. Approval of this document does not constitute agreement with all information or every statement presented in the document.

If you have any questions regarding this letter, please contact Cristina Eads at (505) 490-5808.

Sincerely,



Dave Cobrain
Acting Chief
Hazardous Waste Bureau

cc: C. Eads, NMED HWB
B. Wear, NMED HWB
L. King, EPA Region 6 (6LCRRC)
S. Clark, KAFB

Col. Vattioni and Ms. Clark

March 1, 2023

Page 3

File: KAFB 2022 and Reading