



MICHELLE LUJAN GRISHAM
GOVERNOR

JAMES C. KENNEY
CABINET SECRETARY

Certified Mail - Return Receipt Requested

April 4, 2024



Colonel Michael J. Power, USAF
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 WITH MODIFICATIONS
COMPLETION REPORT FOR DATA GAP MONITORING WELLS KAFB-106240, KAFB-106241, KAFB-106242, KAFB-106243, KAFB-106244, KAFB-106245, AND KAFB-106246 REVISION 1, BULK FUELS FACILITY SOLID WASTE MANAGEMENT UNITS ST-106/SS-111, JUNE 2023
KIRTLAND AIR FORCE BASE, NEW MEXICO
EPA ID# NM6213820974
HWB-KAFB-20-007**

Dear Colonel Power and Ms. Clark:

The New Mexico Environment Department (NMED) received the *Completion Report for Data Gap Monitoring Wells KAFB-106240, KAFB-106241, KAFB-106242, KAFB-106243, KAFB-106244, KAFB-106245, and KAFB-106246 Revision 1, Bulk Fuels Facility Solid Waste Management Units ST-106/SS-111, June 2023* (Report) with cover letter dated June 2, 2023, on June 13, 2023. NMED has reviewed the Report and hereby issues this Approval with the following modifications:

MODIFICATIONS

1. Request For Additional Information: Phase II RFI Report.

NMED Comment: Updated cross sections, as well as 3D renderings of the source zone similar to the ones presented in the PowerPoint presentation in the February 21, 2024 meeting shall be submitted to NMED in a Phase II RCRA Facility Investigation (RFI) Report. KAFB needs to present these cross-sections separately so that documentation of the nature and extent of subsurface contaminants are fully delineated before the submittal of a Corrective Measures Evaluation. Cross sections and figures shall indicate the source(s) of data presented. All contaminants of concern shall be delineated,

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

KAFB5349



including and BTEX, TPH. Figures indicating location of measurable LNAPL in monitoring well screens through time must also be included.

2. Section 2.2: Monitoring Well Development, Page 2-1

Permittee Statement: “Contingency well KAFB-106246 is associated with KAFB-106240 because the contingency well in that well pair was abandoned and replaced (see discussion, below).”

NMED Comment: KAFB-106240’s contingency well that was abandoned has the following characteristics: bottom of the well was 441.9 ft bgs, and a 25 ft screen spanning from 414.9 ft bgs to 439.9 ft bgs. Similar characteristics for the newly installed KAFB-106246 are: bottom of the well was 455 ft bgs, and the 25 ft screen spanning from 428 ft bgs to 453 ft bgs. Explain how the depths of contingency wells were selected and describe the decision-making process for how and when contingency wells will be used. In addition, well KAFB-106246 is not identified on any of the provided figures. Present all well locations in the Phase II RFI and indicate that well KAFB-106246 is a contingency well for KAFB-106240 on the figures.

3. Section 3.3: Decontamination Wastes, Page 3-2

Permittee Statement “The remaining non-hazardous high solids, water, mud, and sand were transported by Advanced Chemical Transport, Inc. to the Twin Enviro Services Penrose, Colorado disposal facility. Disposal manifests are provided in Appendix G-5.”

NMED Comment: In Appendix G-5, every manifest has the material categorized as drill cuttings. Describe how general trash, including spent PPE, miscellaneous plastics, etc. were disposed, and include waste manifests in Appendix G regarding these items if available.

4. Table 2-2, Survey Coordinates and Elevations for Data Gap Monitoring Wells

NMED Comment: The Permittee shall correct the topographical error on the easting for KAFB-106245. The redline strikeout did not have this error. The Permittee must ensure that the redline strikeout and revised Report are consistent with each other.

5. Table 2-3, Elevations for Data Gap Monitoring Well Construction Materials

NMED Comment: Future monitoring well installation reports must have construction and boring logs and diagrams with all information in accordance with Section 6.5.17.10.10 of the Permit.

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The Permittee must submit addendum pages for each of the sections mentioned above. The addendum pages must be submitted with a response letter no later than **May 31, 2024**.

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 Naomi Davidson of my staff at 505-690-7567.

Sincerely,

Ricardo Maestas

Digitally signed by Ricardo
Maestas
Date: 2024.04.04 11:34:41 -06'00'

Ricardo Maestas
Acting Chief
Hazardous Waste Bureau

cc: N. Dhawan, NMED HWB
C. Eads, NMED HWB
N. Davidson, NMED HWB
L. King, EPA Region 6 (6LCRRC)
R. Wortman, KAFB
K. Bicknell, ABCWUA
A. Tafoya, VA

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