



MICHELLE LUJAN GRISHAM  
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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  
INVESTIGATION REPORT FOR DATA GAP MONITORING WELL INSTALLATION KAFB-106248 TO KAFB-106252 AND KAFB-106S10 BULK FUELS FACILITY SOLID WASTE MANAGEMENT UNITS ST-106/SS-111, MARCH 2021  
KIRTLAND AIR FORCE BASE, NEW MEXICO  
EPA ID# NM6213820974  
HWB-KAFB-21-017**

Dear Colonel Power and Ms. Clark:

The New Mexico Environment Department (NMED) received the *Investigation Report for Data Gap Monitoring Well Installation KAFB-106248 to KAFB-106252 and KAFB-106S10 Bulk Fuels Facility Solid Waste Management Units ST-106/SS-111, October 2021* (Report) with cover letter dated October 6, 2021, on October 8, 2021. NMED has reviewed the Report and hereby issues this Approval with the following modifications:

#### MODIFICATIONS

**1. Executive Summary, Page ES-2**

**Permittee Statement:** "It is likely that the elevated concentrations observed in the shallow SVMPs are due to subsurface vapor disturbance caused by the air rotary drilling used to install the SVM well. These points will continue to be sampled during the regular semi-annual monitoring events."

**NMED Comment:** The Permittee should tabulate the results collected since 2020 to prove this hypothesis. In the event consistent elevated concentrations are observed in the shallow SVMPs, further investigation may be required to determine the extent of elevated concentrations.

SCIENCE | INNOVATION | COLLABORATION | COMPLIANCE

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



**2. Section 4.1.1, Groundwater Monitoring Data Gap Wells (KAFB-106248 to KAFB-106251) Page 4-3**

**Permittee Statement:** The GWM data gap wells were constructed as a nested monitoring well including a lower water table well and a higher contingency well.”

**NMED Comment:** The Permittee does not explain how the depths of contingency wells were selected. Describe the decision-making process for how and when contingency wells will be used in a replacement page for this Report.

**3. Section 5.4, Subsurface Conditions, Page 5-4**

**Permittee Statement:** “Cross sections using these data as well as data from previous investigations will be created to describe the nature and extent of subsurface contaminants (including LNAPL) in the Phase II RCRA Facility Investigation (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.

**4. Section 8, Recommendations, Page 8-1**

**Permittee Statement:** “The data collected during this investigation have provided additional lithologic information in the source area and filled data gaps associated with rising groundwater levels. This information, when incorporated with existing data collected from other investigations, will be presented in the Phase II RFI.”

**NMED Comment:** The Permittee must present the nature and extent of contamination with updated figures and cross sections. Though the Permittee provided three cross sections of the source area in Figures 5-2, 5-3, and 5-4, additional cross sections would be beneficial for understanding the conceptual site model. Provide additional cross sections in the Phase II RFI, as well as figures from the PowerPoint presentation on February 21, 2024.

**5. Figure 6-4, Total Petroleum Hydrocarbons, Benzene, Toluene, Ethylbenzene, And Total Xylenes Concentrations in Groundwater**

**NMED Comment:** Figure 6-4 shows the estimated benzene plume from the fourth quarter of 2020. KAFB-106250-447 shows elevated concentrations of TPH-MRO, TPH-

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DRO, TPH-GRO, and benzene. There are no groundwater monitoring wells directly east of KAFB-106250 and based on these results, the extent of the plumes for these contaminants may not be fully delineated to the east of this well. The Permittee must propose to install additional wells to the east of KAFB-106250, east of and adjacent to buildings 1044 and 1047, to fully delineate the plume of TPH and benzene near this area.

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.

The Permittee must address all comments above and submit a response letter with replacement pages, and an electronic version of the revised Report no later than **May 31, 2024**.

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 11:17:26 -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

File: KAFB 2024 Bulk Fuels Facility Spill and Reading