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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 10, 2010

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**RE: BULK FUELS FACILITY SPILL (SWMUS ST-106 AND SS-111)
NOTICE OF PARTIAL APPROVAL WITH MODIFICATIONS AND NOTICE
OF DISAPPROVAL
INTERIM MEASURES, VADOSE ZONE, AND
GROUNDWATER INVESTIGATION WORK PLANS, NOVEMBER 2010
KIRTLAND AIR FORCE BASE, EPA ID# NM9570024423
HWB-KAFB-10-015, HWB-KAFB-10-016, HWB-KAFB-10-019**

Dear Col. Maness and Mr. Pike:

The New Mexico Environment Department (NMED) has reviewed the revised Interim Measures, Vadose Zone, and Groundwater Investigation Work Plans, concerning the Kirtland Air Force Base (KAFB) Bulk Fuels Facility Spill, Solid Waste Management Units (SWMUs) ST-106 and SS-111. The revised plans were submitted November 4, 2010, in response to the NMED's Notice of Disapproval (NOD) issued August 6, 2010.

NMED finds the plans to be deficient, and provides the following comments. However, NMED must also ensure that commencement of the vadose zone and groundwater investigations and interim measures not be further delayed. NMED is therefore partially approving with modifications the Work Plans in accordance with Permit Part 1.38 of the Permittee's Hazardous Waste Operating Permit (Permit), issued July 15, 2010. Those aspects of the Work Plans that are approved with modifications are addressed in Part 1 of this letter. Under Part 1 of this letter, the Permittee must conduct certain activities to

begin the investigation of the vadose zone and groundwater at the Bulk Fuels Facility immediately, and to conduct interim measures at the former Fuel Offloading Rack, prior to approval of the remainder of the Work Plans. These activities are to be conducted as described in this letter, and without delay. The work to be conducted under Part 1 must also be included in the revised Work Plans even if the Permittee believes that such work has been completed when it submits the revised Work Plans for approval. NMED reserves the right to require the Permittee to correct work completed under Part 1 that does not meet the corrective action requirements of Permit Part 6 or the modifications specified in this letter for such work.

Part 2 of this letter concerns those aspects of the Work Plans that are disapproved. The Permittee is further directed, in Part 2 of this letter, to make additional revisions to the three Work Plans, which are necessary before NMED can approve the plans.

PART 1 PARTIAL APPROVAL WITH MODIFICATIONS

The Permittee must begin immediate investigation of the vadose zone and groundwater in accordance with the corrective action requirements of Permit Part 6, and with the modifications to the three Work Plans that are specified in this letter. The Permittee shall also complete the removal of the former Fuel Offloading Rack and the excavation of contaminated soil exceeding NMED Soil Screening Levels (SSLs).

A. Installation of New Groundwater Monitoring Wells

NMED approves the well installations as described in the revised Groundwater Investigation Work Plan submitted November 4, 2010 with the following modifications. The Permittee shall therefore immediately commence installation of the 78 groundwater monitoring wells provided for in Section 5.2.4 of the revised Groundwater Investigation Work Plan. The installation of the wells shall be completed by **April 28, 2011** (Appendix B of the Groundwater Investigation Work Plan).

Because steel well screens and casing would render most of the geophysical logs useless the Permittee must use polyvinyl chloride (PVC) screens and casing for the deep wells. The Permittee may substitute PVC screens and casing for the intermediate-depth wells, and may use PVC screens and casing for wells screened across the water table at locations where LNAPL is not present.

Section 5.2.4.1 of the Groundwater Investigation Work Plan, *Monitoring Well Installation Procedures*, item #6 states that three PVC centralizers would be used in well construction, one installed directly above and one below the well screen and one installed at the midpoint of the well. In lieu of a centralizer installed at the midpoint, the Permittees shall install PVC centralizers approximately every 100 feet between the top of screen and the ground surface.

The borehole of each well shall be logged in accordance with Permit Part 6.5.15 by a registered professional geologist.

Screen lengths for wells shall not exceed 15 feet, with the exception that wells screened across the water table shall have screens 20 feet long, with no more than 15 feet of screen length situated below the water table.

Each of the new wells shall be developed pursuant to Permit Part 6.5.17.10.6. Pursuant to Permit Part 6.5.17.3, initial groundwater samples shall be obtained from newly-installed monitoring wells within 30 days after completion of well development. Groundwater sampling and reporting requirements shall be conducted as directed in NMED's letter of June 4, 2010, and as specified in Permit Part 6.5.17.5.

B. Development of Existing Wells

In NMED's letter of April 2, 2010, the Permittee was directed to develop all existing wells located within the LNAPL plume, and to make such wells available to sample groundwater below the floating LNAPL so that concentrations of dissolved-phase contaminants can be assessed in this area. This work was to be completed by July 6, 2010. The Permittee failed to complete this work. Furthermore, the revised Groundwater Investigation Work Plan does not contain any provisions for developing the existing wells within the LNAPL plume.

NMED is again directing the Permittee to develop all existing wells located within the LNAPL plume, and to make such wells available to sample groundwater. Well development shall be conducted in accordance with Permit Part 6.5.17.10.6. The work must be completed no later than **February 15, 2011**.

C. Geophysical Logging of Existing Wells

In the August 6, 2010, NOD, the Permittee was directed to conduct borehole geophysical logging (medium and deep induction, gamma, and neutron) at all existing groundwater monitoring wells, and to submit copies of the geophysical logs to the NMED by October 6, 2010. The Permittee failed to complete this work on time, but provides for the geophysical logging of existing wells in the revised Groundwater Investigation Work Plan.

NMED approves the Permittee's proposal to conduct borehole geophysical logging (medium and deep induction, gamma, and neutron) at all existing groundwater monitoring wells. Copies of the logs must be submitted to the NMED by no later than **February 15, 2011**.

D. Completion of Soil Borings

NMED approves the projects in Sections D and E of this letter as described in the revised Vadose Zone Investigation Work Plan submitted November 4, 2010 with the following modifications. The Permittee shall immediately complete the 35 deep and 5 shallow soil borings provided for in Section 5.2.10 of the revised Vadose Zone Investigation Work Plan. The work shall be completed by **February 11, 2011** (Appendix B of the Vadose Zone Investigation Work Plan). Each deep boring at each location shall be drilled from the surface to the water table.

Soil samples from the deep borings shall be collected at a frequency of at least one sample every 10 feet for the first 50 feet, and at least one sample thereafter every 50 feet to total depth, and at least one sample at total depth in each boring. The soil samples shall be analyzed for TPH, VOCs, SVOCs, and lead.

Soil samples from shallow borings shall be collected at depths of 0, 5, 10, 15, and 20 feet and shall be analyzed for TPH, VOCs, SVOCs, and lead.

Each soil boring shall be logged in accordance with Permit Part 6.5.15 by a registered professional geologist.

E. Installation of New Soil-Gas Monitoring Wells

The Permittee shall immediately install the 35 soil-gas monitoring wells provided for in Section 5.2.11 of the revised Vadose Zone Investigation Work Plan submitted November 4, 2010. The well installations shall be completed by **February 11, 2011** (Appendix B of the Vadose Zone Investigation Work Plan).

The soil-gas monitoring wells shall be capable of yielding discrete samples of soil gas recovered from depths of 25, 50, 150, 250, 350, and 450 feet below the ground surface.

The borehole of each well shall be logged in accordance with Permit Part 6.5.15 by a professional geologist.

Vapor sampling and reporting requirements shall be conducted as directed in NMED's letter of June 4, 2010.

F. Geophysical Logging of New Groundwater and Soil-Vapor Wells

NMED approves the Permittee's proposal to conduct borehole geophysical logging (medium and deep induction, gamma, and neutron) at all new groundwater and soil-vapor monitoring wells. Copies of the logs must be submitted to the NMED by no later than **June 1, 2011**.

G. Interim Measures at Former Fuel Offloading Rack

The NOD issued August 6, 2010, specified that the Permittee begin removal of the remaining components of the former Fuel Offloading Rack and excavation of contaminated soil exceeding NMED SSLs to 20 feet (SSLs shall be those based on residential land use) by October 6, 2010. The Permittee was also instructed that laboratory analysis of soil samples shall be conducted to determine the concentrations of hazardous constituents for the purpose of defining the final extent of excavation, for risk assessment, and for waste determination. NMED approves the Permittee's proposal for sample analysis, with the following modification: Soil samples shall be analyzed in the laboratory for TPH, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and lead, and collected on all sides and the bottom of the excavation at a spacing not to exceed 25 feet. Additionally, the excavation of soil and removal of the former Fuel Offloading Rack shall be completed by October 6, 2011, and a report on completion of the work submitted to the NMED by January 15, 2012.

NMED approves the Permittee's soil sampling plan except as modified below. Section 4.5.2 of the Interim Measures Work Plan, *FFOR Soil Investigation and Sampling*, indicates that the direct-push technology (DPT) samples are to be collected at the former Fuel Offloading Rack (FFOR) and along the remaining aboveground and underground piping on 25-ft centers. The Permittee does not adequately describe the locations of the samples nor are the locations individually depicted on Figure 4-2. No additional sampling is proposed for the known three locations of pipeline leaks, which occurred approximately 18 ft, 150 ft, and 200 ft from the west end of FFOR.

For underground piping from Building 1033 (Pump House) to its terminus at the west end of the FFOR, the Permittee shall instead collect soil samples on 10-ft centers along a line oriented directly over what was once the centerline of the now-excavated pipeline (hereafter referred to as the former pipe centerline). Soil samples shall also be collected at locations spaced no further than 10 ft apart along two lines oriented parallel to the former pipe centerline, with the two lines situated no further than 5 ft from and on opposite sides of the former pipe centerline. Sampling shall also be conducted directly beneath each of the three known leak locations.

At each of the three known leak locations, sampling shall be increased by collecting soil samples at 5 ft by 5 ft grid nodes.

At each sampling location, soil samples shall be collected at depths of 0, 5, 10, 15, and 20 feet.

If lead, VOCs, or SVOCs are detected in soil at concentrations exceeding the NMED SSLs at a given location, the soil at the location shall be excavated, removed from the site, and properly disposed of. The Permittee shall also increase the sampling grid at the location by using the same method as directed above for sampling the three known leak locations, and collect and analyze the additional samples. Expansion of sampling and the collection and analysis of additional samples shall continue until all soil containing VOCs, SVOCs, or lead at concentrations exceeding the NMED SSLs have been excavated.

Section 4.5.2.1, Bullet 4, of the Work Plan states “The field Geologist will collect samples for laboratory analysis that appear to contain the greatest degree of contamination based on visual observation and headspace VOC screening...”, suggesting that not all samples will be submitted to the laboratory for analysis. Because headspace analysis will not detect lead and may not detect SVOCs, all soil samples must be submitted to the laboratory for analysis.

Confirmation samples are samples collected to verify that all contaminated soil with concentrations of hazardous constituents exceeding the NMED SSLs has been excavated and removed. In Section 4.5.3.6, *Confirmation Sampling*, the Interim Measures Work Plan indicates that confirmation samples will not be collected from the sidewalls of the excavation. In contrast, the Interim Measures Work Plan in Section 4.5.1 indicates that sidewalls will be sampled for confirmation.

Confirmation samples must be collected from the bottom and sides of all excavations at intervals not to exceed 25 feet. This includes any areas excavated to depths of 20 ft. The Permittee can collect sidewall conformation samples ahead of, behind, or through shoring via portholes cut through the shoring.

Excavation of contaminated soil at the former Fuel Offloading Rack must be completed by **October 6, 2011**.

H. Piping From Building 1033 to Tanks

NMED approves the Permittee’s soil sampling plan, except as modified below. The Permittee must excavate to a depth of up to 20 feet any contaminated soil exceeding NMED SSLs that occurs along the piping from Building 1033 to the jet-fuel fuel storage tanks. In lieu of what the Permittee proposed, for the underground and aboveground piping from Building 1033 to the jet-fuel storage tanks, the Permittee shall collect soil samples at locations spaced no further than 20 ft apart along two lines oriented parallel to the pipe centerline, with the two lines situated no further than 5 ft from and on opposite sides of the pipeline. Soil samples shall be collected at depths of 0, 5, 10, 15, and 20 feet and shall be analyzed in the laboratory for TPH, VOCs, SVOCs, and lead.

If lead, VOCs, or SVOCs are detected in soil at concentrations exceeding the NMED SSLs at a given location, the soil at the location shall be excavated and removed from the site for proper disposal. The Permittee shall also increase sampling at the location by using the same method as directed above for sampling the three known leak locations at the former Fuel Offloading Rack, and collect and analyze the additional samples. Expansion of the sampling and the collection and analysis of additional samples shall continue until all soil containing VOCs, SVOCs, or lead at concentrations exceeding the NMED SSLs are excavated and removed from the site for disposal.

Section 4.5.2.1, Bullet 4, of the Work Plan states “The field Geologist will collect samples for laboratory analysis that appear to contain the greatest degree of contamination based on visual

observation and headspace VOC screening...”, suggesting that not all samples will be submitted to the laboratory for analysis. Because headspace analysis will not detect lead and may not detect SVOCs, all soil samples shall be submitted to the laboratory for analysis.

Confirmation samples must be collected from the bottom and sides of all excavations at intervals not to exceed 25 feet. This includes any areas excavated to depths of 20 ft. The Permittee can collect sidewall conformation samples ahead of, behind, or through shoring via portholes cut through the shoring.

Sampling along the pipeline from Building 1033 to the storage tanks shall be completed by **March 7, 2011**.

I. Soil-Vapor Extraction

In the August 6, 2010, NOD, the Permittee was directed to install and operate additional SVE units, or prepare for SVE operations at the following 16 locations: existing groundwater monitoring wells KAFB-3411, KAFB-10614, KAFB-10624, KAFB-10617, KAFB-10618, and KAFB-10610, at soil boring/soil-vapor monitoring well locations # 4, 5, 9, 10, 11, 12, and 21 listed in Table 1 of the NOD, and soil-vapor monitoring well locations #3, 8 and 9 on Table 2 of the NOD. The Permittee did not accomplish this work, and did not propose any alternative work for NMED to consider. Furthermore, the Permittee has not done anything in the past four months to accelerate the reduction of the soil-vapor mass in the vadose zone at the Bulk Fuels Facility.

Nevertheless, NMED has reconsidered its earlier position to expand the number of SVE Units. Instead of expanding the number of operating SVE Units, the Permittee is directed to prepare the locations of existing groundwater monitoring wells KAFB-3411, KAFB-10614, KAFB-10624, KAFB-10617, KAFB-10618, and KAFB-10610 for conducting SVE by no later than **February 15, 2011**. The Permittee is also directed to prepare an SVE Optimization Plan for the four existing SVE Units, with the concept that the four SVE units will be moved periodically between the six aforementioned locations and the four locations where SVE is currently conducted to maximize the removal of contaminants (by mass) via vapor extraction. Furthermore, the Permittee must propose in the SVE Optimization Plan alternative technologies for the removal and treatment of soil-vapor contamination that do not rely on the use of internal combustion engines. The SVE Optimization Plan must be submitted to NMED by **March 31, 2011**.

J. Special Tests under Interim Measures Work Plan

NMED approves the ROI, hydrocarbon baildown, and PneuLog tests. The Permittee shall conduct the Radius of Influence, the Hydrocarbon Baildown, and PneuLog tests by **April 6, 2011; March 2, 2011; and December 21, 2011**, respectively.

K. Collection of LNAPL Sample

The Permittee shall collect a sample of LNAPL from one of the groundwater monitoring wells within the LNAPL plume and provide the sample to the Scientific Laboratory Division (SLD) of the New Mexico Department of Health by no later than **March 31, 2011**. The Permittee shall notify the NMED in writing of the delivery of the LNAPL sample to the SLD no later than **1 business day** following delivery of the sample.

The Permittee is directed to conduct all activities required in Part 1 of this letter in accordance with the terms described in each section of this letter and to resubmit the Work Plans with the required revisions along with the changes required by Part 2 of this letter. Any portion of a Work Plan that was not specifically approved and modified as described above is disapproved and must be corrected as described in Part 2.

PART 2 PORTIONS OF WORK PLANS THAT ARE DISAPPROVED

A. Deficiencies Common to All Three Plans

1. Part 1, A.7 of the NOD issued on August 6, 2010, required that the Permittee list the data gaps that apply to each of the three plans, as appropriate for the topic of a plan. The Permittee was also instructed to revise the Interim Measures, Groundwater Investigation, and Vadose Zone Work Plans to include a description of at least the data gaps identified by the NMED and point specifically to where in each of the documents the data gaps are addressed.

This deficiency was not corrected in any of the revised Work Plans submitted on November 4, 2010. The NMED is directing the Permittee again to revise the Interim Measures, Groundwater Investigation, and Vadose Zone Work Plans to include a description of the data gaps identified by the NMED and point specifically to where the data gaps are addressed in each of the documents.

2. Part 1, A.9 of the NOD issued on August 6, 2010, required that the Permittee include a site conceptual model encompassing the source area(s), the fuel percolation area, the light non-aqueous phased liquid (LNAPL) plume floating on groundwater, and the dissolved-phase contaminant plume in groundwater in each of the plans. However, none of the revised Work Plans contains a site conceptual model. Instead, the issue was addressed under the Work Plans by stating that a model will be provided later by the Permittee.

The NMED is directing the Permittee again to revise the Interim Measures, Groundwater Investigation, and Vadose Zone Work Plans to include a site conceptual model encompassing the source area(s), the fuel percolation area, the light non-aqueous phased liquid (LNAPL) plume floating on groundwater, and the dissolved-phase contaminant plume in groundwater in each of the plans. The model should be illustrated through the liberal use of detailed, accurate, and scaled geologic cross-sections, maps in plan view, and any other necessary graphical

representations to clearly and accurately show geologic and hydrologic features, and contaminant levels. NMED invites the Permittee to meet to discuss NMED's expectations with respect to the conceptual model and graphic representation of data.

3. Part 1, A.10 of the NOD issued on August 6, 2010, required that the Permittee meet Section E of the NMED's letter of April 2, 2010, which directed that investigation plans are to include relevant maps and cross-sections that show concentration data for contaminants and other relevant information with supporting data posted on the maps and cross-sections, and clearly show which borings/wells contributed data towards construction of the maps and cross-sections and which did not. Additionally, tables including all existing soil borings, soil-gas monitoring wells, and groundwater monitoring wells, listing their surveyed location, sampling points and maximum depth of exploration were also to be included in the plans. For soil-gas monitoring wells, tables and graphs were also to be included providing trends of TPH concentration versus time for the depths below ground surface of 25, 50, 150, 250, 350, and 450 feet.

The required maps, cross-sections, tables, and graphs were not included in the Work Plans submitted November 4, 2010. Revise the Work Plans accordingly.

4. Appendix E, *Uniform Federal Policy-Quality Assurance Project Plan* – This plan is incorporated into the Vadose Zone Investigation, Groundwater Investigation, and Interim Measures Work Plans. The plan, as written, appears to be a combination of many types of plans, such as project management, training, data validation, quality assurance, and sampling and analysis plans. Additionally, much of the information presented appears to be overly burdensome and not particularly useful in the present format. For example, a tabulated listing of field quality control samples to be collected for every quarter/year is unnecessary as the types and frequencies of such samples are not likely to change every quarter or even every year. Listings of quality control targets (in particular, limits for laboratory control samples) from three different entities are also not useful – instead only those that will actually be used for this particular project should be listed.

The Permittee must revise Appendix E into multiple appendices to separate the various types of plans (e.g. project management, training, data validation, quality assurance, and sampling and analysis). The various listings of laboratory analytes per media (QAPP Worksheet # 18a-c), field quality control samples (QAPP Worksheet # 20a-c), quality control targets (Appendix A of Appendix E) should be revised to simplify the information presented and contain only the necessary information to support the Bulk Fuels Facility Spill project. Some tables, such as QAPP Worksheets # 3, 4, 9, 16, 24c, 25, 28a-d, do not provide useful information to the NMED and should be deleted.

NMED is expecting a Quality Assurance (QA) Plan that contains specific quality assurance and quality control activities for the Bulk Fuels Facility Spill project. The QA plan is to integrate all technical and quality aspects of the project to ensure that the necessary type and quality of data are obtained to adequately characterize the release, the contaminated media, and for conducting and verifying clean up. NMED invites the Permittee to meet and discuss NMED's expectation

with respect to what should be in the QA Plan, as well as project management, training, data validation, and sampling and analysis plans.

B. Groundwater Investigation Work Plan

1. The Permittee must describe in the first paragraph of Section 5.2.5 what geophysical logging has been previously conducted at existing wells.
2. The last paragraph on page 5-19, Section 5.2.5.1, states “The logs will be run from the groundwater table (approximately 500 ft bgs) to ground surface through the well casing.” Correct the text to read “The logs will be run from the bottom of the well to the ground surface.” Also, change all references to “groundwater table” in the Groundwater Investigation Work Plan to the correct term “water table”.
3. The first sentence on page 5-20, Section 5.2.5.1, references a proposed seismic survey. Discuss the survey, or remove the reference to the seismic survey if such a survey will not be conducted.
4. Section 5.2.5.2, *Induction Logging*, on page 5-22, 3rd paragraph, 1st sentence states: “The borehole induction system can be used in boreholes that range from 2 to 8 inches diameter without significant borehole effects.” Because the Permittee is proposing to drill boreholes with diameters of 9-5/8 and 11-3/4 inches, indicate whether the borehole induction system can be used properly in boreholes with diameters greater than 8 inches, or modify the plan to indicate that another, more appropriate tool will be used to log the boreholes.
5. Section 5.2.5.2, *Induction Logging*, page 5-22, the last sentence of the 3rd paragraph states; “The maximum depth of measurement for the most induction logging systems is 650 ft (200) meters.” Explain what this sentence means, as wells many thousands of feet deep are logged using induction logging. If the sentence is incorrect, correct the sentence or delete it from the Work Plan.
6. The last paragraph and bullets in Section 5.2.5.2, *Induction Logging*, discusses general procedures for all geophysical logging. This discussion needs to be moved to a more general section, such as Section 5.2.5 *Logging Requirements*. Also:
 - a. Add total depth from the logger to the list of bullets.
 - b. Add the same information to the list of bullets that is to be recorded in the first bullet of Section 5.2.3.2 of the Vadose Zone Investigation Work Plan (e.g., logging tool serial number, sensitivity range setting).
 - c. The Permittee must include the measured deviation between the “zero point” of the tool at ground level at the start of the logging run and after completing the logging run.

7. Describe in Section 5.2.5.1 of the Work Plan if tools are to be run centralized, decentralized, or free in casing and describe where that information will be recorded.
8. Section 5.2.6.1, Logging System, p.5-25, last sentence, states “The logging system will be equipped with.... cable long enough to log 600-ft.depths.” Because some of the groundwater monitoring wells may be 610-620 ft deep, the logging system must be capable of logging the full depth of all wells, even those in excess of 600 ft depth.
9. Table 4-1, Data Quality Objectives Summary Table, in the 3rd and 4th column in row 4, *Define the Study Boundary* states “Study boundaries are indicated on Figure 2-1”. Many wells are outside the study boundary shown on the figure. Correct the statement or the figure as appropriate.

Revise Table 4-1 in accordance with the directives in this letter, or delete the table. Although the Permittee may use the EPA’s DQO process to plan work, NMED prefers that Table 4-1 and Section 4 be deleted from the Work Plan, as they add little additional useful information. Items in the table should be included in the text of the Work Plan with additional details and as modified in accordance with the directives of this letter.

10. Table 4-1, Data Quality Objectives Summary Table, in the 3rd and 4th column in row 6, *Specify Limits on Decision Errors* states “Borehole geophysics measurements obtained is less than 1 ft.” Explain what this sentence means, especially in light of the second sentence in Section 5.2.5.2 on page 5-22, which states ”The intercoil spacing resolves conductivity layers 20 inches thick.” See comment # 9 above about the deletion of Table 4-1 and Section 4.
11. Section 5.2.7, *Borehole Geophysics Equipment Decontamination* – Revise the Work Plan to indicate clearly that both the cable and probe will be decontaminated.

12. The 2nd paragraph, last sentence of the *Preface* states “Part II will consist of the evaluation of all existing and new data, and development of the risk assessment (including the conceptual site model), and the Groundwater Investigation Report (including cross sections and plan views).”

Revise the Work Plan to include a detailed description of what is to be included in the Part II Work Plan. NMED notes further that the inclusion of a “report” in a work plan is unusual and generally inappropriate. Information derived from newly completed work is normally submitted as a stand alone report, not as a section of a work plan.

Furthermore, the schedule in Appendix B lists the Part II Work Plans as being submitted by August 6, 2011. Because the contents of the Phase II plans are unknown to the NMED, the NMED can not agree to this submittal due date.

13. There are few details of reporting in the Work Plan, and most of those are aimed at the geophysical logging. Revise the Work Plan to include details for reporting on well installation, monitoring, and sampling results.

14. Section 3.5.3, *Identification of Contaminants of Potential Concern*, page 3-10 lists WQCC water quality standards from 20.6.2 NMAC. The cleanup levels for groundwater shall be the New Mexico Water Quality Control Commission (WQCC) water quality standards (20.6.2.3103 and 20.6.2.4103 NMAC) and the drinking water maximum contaminant levels (MCLs) adopted by EPA under the Federal Safe Drinking Water Act (42 U.S.C. §§ 300f to 300j-26). If both a WQCC standard and a MCL have been established for a contaminant, then the most stringent of the two levels shall be the cleanup level for that contaminant.

If a WQCC standard or MCL has not been established for a contaminant, the EPA Regional Screening Level (RSL) (EPA, 2009) for tap water shall be used as the cleanup level. If a RSL for tap water does not exist for a contaminant, and toxicological information is available, the Permittee shall propose a cleanup level based on a residential scenario, a total target human health excess cancer risk level of 10^{-5} and for non-carcinogenic contaminants a HQ of one (1.0). Revise the Work Plan accordingly.

See Permit Section 6.2.3.1.

15. Section 3.5.4, *Light Non-Aqueous Phase Liquid Distribution*, contains a list of wells where LNAPL has been detected. Add well KAFB-10628 to the list.

16. Section 5.2.3.1, page 5-6, 3rd bullet, discusses a scale of 1 inch =10 feet for drilling logs for wells shallower than 200 feet, but does not address a scale for wells greater than 200 feet. Because all wells are likely to be greater than 200 feet deep, identify the scale to be used.

17. Section 5.2.4, *Groundwater Monitoring Wells*, page 5-14, 2nd paragraph, last sentence states "A schematic showing a well construction detail is included in Appendix D, Forms 4, 5, 6, and 7." None of the four forms seems to fit the proposed construction details with a single cased, telescoped borehole, as shown on Figure 5-1. Revise the Work Plan to include appropriate well-construction field forms.

18. Section 5.2.4.3, *Well Development*, 2nd bullet discusses stabilization of groundwater field parameters during well development. Water stability indicators must be as described in the Permit, not as listed in this section, or as listed in Appendix D. Form 8, *Well Development Record and Water Quality Field Data Sheet (Continued 5 of 6)*.

19. Appendix D. Form 8, *Well Development Record and Water Quality Field Data Sheet (Continued 5 of 6)* lists conversion factors to determine the volume of well water to be purged for development and sampling based upon the height of the water column in the well. A distinction is made between a dedicated and non-dedicated system. NMED does not recognize such a

distinction and requires that all well development meet Permit Part 6.5.17.10.6 and that well purging be conducted as directed in NMED's letter of June 4, 2010, and Permit Part 6.5.17.4.

20. Appendix C, *Waste Management Plan*, Table 2 implies that the preferred method of disposal of non-hazardous waste water, a form of investigation-derived waste (IDW), is to discharge it to the ground surface. NMED encourages the Permittee to dispose such non-hazardous waste water into the City of Albuquerque's Publically-Owned Treatment Works (POTW) sewer system. Furthermore, all such water must be containerized and tested prior to disposal in accordance with 20.4.1.300 NMAC incorporating 40 CFR § 262.11. Waste water from one well can not be commingled with that from any other well or wells unless demonstrated not to be a hazardous waste.

21. The Permittee shall address the following concerning Appendix E, *Uniform Federal Policy-Quality Assurance Project Plan*.

- a) Appendix E is shown as "(Pending Review)". This suggests that Appendix E is a draft document. Revise the Work Plan to contain only finished products, ready for NMED review.
- b) Appendix E, page 77, Section 17.2, first paragraph, correct "April 2009" to the appropriate date.
- c) Appendix E, page 77, Section 17.2 must clearly state quarterly groundwater monitoring will occur until a change is approved by NMED.
- d) Describe what risk evaluation the Permittee is expecting to do and why.
- e) List the data quality objectives that the QAPP must address.
- f) Describe the Quality Assurance for geophysical logging.
- g) Appendix E, Section 17.5 (and elsewhere) – Samples must be analyzed at an EPA-certified laboratory. Also, the Permittee must indicate whether the referenced Department of Defense Environmental Laboratory Accreditation Program (DoD ELAP) laboratory is EPA-certified. Revise the Work Plan accordingly.
- h) Appendix E, Section 17.8, *Investigation-Derived Waste* –This section needs to clearly state that no IDW water from individual wells will be comingled before appropriate testing.
- i) Appendix E, Section 17.9.4 states that no trip blanks will be collected for soil samples for VOC analysis. Revise the Work Plan to indicate that trip blanks are required for soil samples that are to be analyzed for VOCs.
- j) Appendix E, Section 17.9 must include percent frequency of field quality control samples in each subsection. The sampling frequency must be as described in Permit 6.5.17.6.

- k) Appendix E, Section 17.9.5, states field (ambient) blanks will be collected for groundwater only. Revise the Work Plan to include field blanks for soil sampling.
- l) Appendix E mainly addresses sampling only for laboratory and field analyses. Other field activities, such as surveying and geophysical logging need to be addressed.
- m) Appendix E, Section 17.2.2, *MNA Groundwater Monitoring*, states “30 groundwater monitoring wells will be installed for the monitored natural attenuation (MNA) investigation effort.” Specify which wells these are and the purpose of this monitoring given that NMED has not made any decision concerning MNA as a remedy. Additionally, Section 11.2 of Appendix E, indicates that there are 35 wells to be included in the study. Specify which number of wells is correct.
22. Revise the Work Plan to provide for the collection and maintenance of representative soil samples encountered during well installations and to indicate that said samples will be made available for NMED inspection upon request by the NMED. Additionally, Section 11.2 of Appendix E indicates that there are 35 wells to be included in the study. Specify which number of wells is correct.
23. Revise the Work Plan to specify the frequency that soil samples will be tested for grain size via sieve analysis. Indicate the specific sieve screen sizes that will be utilized for the testing.
24. Table 6-2 lists only two soil samples each to be collected for grain size, residual LNAPL saturation, Water/LNAPL Drainage Capillary Pressure and Water LNAPL Relative Permeability and only one LNAPL sample each for testing for viscosity, fluid density and surface and interfacial tension. Revise the Work Plan to describe why these few numbers of samples are sufficient for the range of conditions at the site. Also, clarify in the table if the column titled “No. of Field Samples” is correct, and if the column “Total No. of Samples to Laboratory” is correct.
25. Saturated hydraulic conductivity and porosity are important variables in groundwater flow considerations. Specify field or laboratory tests that will be conducted to arrive at a range of site specific values. Revise the Work Plan to indicate how values for saturated hydraulic conductivity and porosity will be assessed.

C. Vadose Zone Investigation Work Plan

1. Geophysics – Revise the Vadose Zone Investigation Work Plan in accordance with the above Comments 1-8 and 10-11 concerning Groundwater Investigation Work Plan.
2. Geophysical logging is proposed in soil-gas wells with 2-inch casing. Confirm that all tools fit in 2-inch casing, given the neutron probe is described as being 60 mm in diameter (2.36 inches, see page 5-24 of the Groundwater Investigation Work Plan, first paragraph, last sentence) or make an appropriate change in tool size or casing size.

3. For the soil vapor wells, describe where the 2-inch casing will be located in the borehole (e.g., in the center, closer to one side), and if so, how geophysical logging conducted in the 2-inch casing could be affected by the other soil-vapor monitoring points attached to 0.75-inch diameter casing in the same nested borehole.
4. The Work Plan does not include a detailed discussion of soil-vapor sampling. Revise the Vadose Zone Investigation Work Plan to include a section describing soil-vapor sampling in detail, with discussion of sampling methods, analytical methods, sampling frequency, laboratory and field quality control, handling, shipping and packaging, and reporting of results.
5. Section 5.2, top line on page 5-3 references Table 4 of the August 6, 2010, NOD for number, location, and depths of soil borings/soil-vapor wells. The table number is incorrect. The correct reference is Tables 1, 2 and 3.
6. Table 5-2 of the Work Plan does not show an exact correspondence to the August 6 letter. However, NMED will accept the locations as described in Table 5-2.
7. Section 5.2.10, *Soil Borings/Drilling*, page 5-18, last sentence, 1st paragraph, mentions “10 ¾” O.D. casing whereas Figure 5-2 shows “11 ¾” casing. Correct, as appropriate, the figure or the text.
8. Section 5.2.10, *Soil Borings/Drilling*, page 5-18, last sentence, 1st paragraph, mentions telescoping to a smaller diameter borehole at 200 feet, while Figure 5-2 shows telescoping to a smaller diameter borehole at 150 feet. Correct, as appropriate, the figure or the text.
9. Revise the Work Plan to add total depth from the logger to the first bullet of Section 5.2.3.2.
10. In the bullets of Section 5.2.3.2, define what “Assemble the downhole logging tool” means as a type of information recorded, or remove the bullet.
11. Section 6.1, *Soil Sampling*, Revise the Work Plan to indicate that additional samples will be collected and analyzed, beyond those obtained at the planned sampling intervals, if field evidence suggests contamination may be present as required in Permit Part 6.5.11.
12. Describe what will be submitted in Part 2 Vadose Zone Investigation Work Plan, indicate when the information will be submitted, and explain why any of the information that was required by November 8, 2010, was not included in Part 1.
13. Appendix E, Section 17.3, *Pre-remedy Quarterly Monitoring Program – Soil Vapor*, discusses soil-vapor monitoring. Describe the risk evaluation the Permittee is proposing to conduct and the purpose of the evaluation. Revise the Work Plan to state that soil-gas

monitoring will be conducted quarterly until a change in frequency or termination of soil-gas monitoring is approved by the NMED.

14. Table 5-2 – Correct the date of the “August 8” letter to “August 6” in the title and last column heading.
15. Table 5-2 – Correct the locations listed in the last column under Shallow Borings. The same location is given for the five separate borings. Revise the Work Plan to correct the location numbers.
16. There are few details of reporting in the Work Plan, and most of those are aimed at the geophysical logging. Revise the Work Plan to include details for reporting on well installation, monitoring, and sampling results.
17. Section 5.2.11, Soil Vapor Monitoring Wells, p.5-27, 1st paragraph, discusses movement of the monitoring point by up to 20 feet if the point lies in a fine-grained layer. This is acceptable for the four deepest points (150, 250, 350, 450) but not for the two shallow points (25, 50). Movement of up to +/-5 feet for the shallow points will be acceptable. Screen depths can only be changed if the adjustment sets the screen in a more permeable geologic unit.
18. Section 5.2.11, Soil Vapor Monitoring Wells, p.5-27, 1st paragraph, states “If a large deviation is required, the NMED will be notified in writing of the deviation.” All deviations must have prior written approval from NMED.

D. Interim Measures Work Plan

1. Section 2.4.5.3.2, Waste Profiling – The Work Plan states that soil will be characterized in place by sampling waste, but is unclear how sample locations will be selected and at what frequency that samples will be collected. Revise the Work Plan accordingly.
2. Section 4.6.11, Radius of Influence (ROI) Testing – The Work Plan does not indicate which existing wells will be used for the testing. Revise the Work Plan to list the wells to be used in the ROI tests.
3. Section 4.6.2.4 states that soil-gas wells will be constructed with 2-inch casing. Figure 4-4 indicates that the deepest monitoring point will be constructed using 3-inch casing. Revise the Work Plan to indicate the correct casing diameter. If 2-inch casing is correct, confirm that all geophysical tools will fit in 2-inch casing, given the neutron probe is described as being 60 mm in diameter (2.36 inches, see p.5-24 of the Groundwater Investigation Work Plan, first paragraph, last sentence) or make an appropriate change in tool size or casing size.

If 2-inch casing is correct, describe where the 2-inch casing will be located in the borehole (e.g., in the center, closer to one side), and if so, how geophysical logging conducted in the 2-inch

casing could be affected by the other soil-vapor monitoring points attached to 0.75-inch diameter casing in the same nested borehole.

Final Direction

The Permittee must meet the deadlines specified in the Compliance Schedule at the end of this letter. The Interim Measures, Groundwater Investigation, and Vadose Zone Work Plans must be revised and resubmitted by the Permittee to the NMED for its review and approval by **March 31, 2011**. The revisions of the Vadose Zone, Interim Measures, and Groundwater Investigation Work Plans must address the comments noted herein and incorporate the requirements set forth in this letter. The Permittee shall also implement the interim measures and other actions as directed under Part 1 of this letter by the dates indicated and in accordance with the Compliance Schedule.

To the extent any requirement of this letter requires access to property not owned or controlled by the Permittee, the Permittee shall use its best efforts to obtain access from the present owners of such property to conduct the required activities. In the event that access is not obtained when necessary, the Permittee shall immediately notify the Department in writing regarding its best efforts and its failure to obtain such access.

The Permittee must document all field activities in accordance with Permit Part 6.5.2. All equipment that is not disposable must be decontaminated pursuant to Permit Part 6.5.3. All equipment that requires calibration must be calibrated as required under Permit Part 6.5.4. Sample handling, shipping, and custody procedures must comply with Permit Part 6.5.5. The collection and management of investigation-derived waste must conform to Permit Part 6.5.7. Well and boring locations must be surveyed in accordance with Permit Part 6.5.8. Field quality control samples must be collected and analyzed for all environmental media pursuant to Permit Parts 6.5.14 and 6.5.17.6. Laboratory analyses, including laboratory quality control samples, must be conducted as required under Permit Part 6.5.18. Field and laboratory quality control data must be reviewed and validated in accordance with Permit Part 6.5.18.3. Reporting of field activities, including sampling and analysis results, completion of soil borings, geologic and geophysical logging, and well installations, must be as directed by NMED's letter of June 4, 2010, for quarterly reporting.

The requirement under Permit Part 6.1.2 that the Permittee is to notify the NMED a minimum of 15 days in advance of field activities is waived for the work to be completed in the following sections of Part 1 of this letter: *A. Installation of New Groundwater Monitoring Wells, B. Development of Existing Wells, C. Geophysical Logging of Existing Wells, D. Completion of Soil Borings, Installation of New Soil-Gas Monitoring Wells, and I. Soil-Vapor Extraction*. The Permittee shall instead notify the NMED of these field activities by e-mail or letter by no later than the date that each of the activities begins.

Compliance Schedule

Revisions to Work Plans	
Submittal	Due Date
Interim Measures Work Plan	March 31, 2011
Vadose Zone Work Plan	March 31, 2011
Groundwater Investigation Work Plan	March 31, 2011
Well Installations, Soil Borings, Interim Measures, and other Actions	
Activity	Completion Due Date
Complete installation of new groundwater monitoring wells	April 28, 2011
Complete development of existing wells	February 15, 2011
Complete geophysical logging of existing wells	February 15, 2011
Complete soil borings	February 11, 2011
Complete installation of new soil-gas monitoring wells	February 11, 2011
Complete geophysical logging of new groundwater and soil-gas wells	June 1, 2011
Complete excavation of soil at former Fuel Offloading Rack	October 6, 2011
Complete investigation of piping from Building 1033 to storage tanks	March 7, 2011
Complete preparation of locations for soil-vapor extraction	February 15, 2011
Submit SVE Optimization Plan to NMED	March 31, 2011
Complete Radius of Influence tests	April 6, 2011
Complete Hydrocarbon Baildown tests	March 2, 2011
Complete PneuLog tests	December 21, 2011
Provide LNAPL sample to Scientific Laboratory Division of NM Department of Health	March 31, 2011
Notify NMED that LNAPL sample has been delivered to Scientific Laboratory Division of NM Department of Health	No later than 1 business day following delivery of the sample.

LNAPL Plume

NMED's directives as expressed in its April 2, 2010, letter and the August 6, 2010, NOD required the Permittee to provide an Interim Measures Work Plan to conduct interim measures to remediate the LNAPL plume within five years. The revised Interim Measures Work Plan submitted November 4, 2010, does not contain such a plan. Rather than complying with NMED's direction to take immediate action to conduct LNAPL remediation, the Permittee proposes in the revised Interim Measures Work

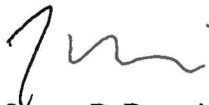
Plan to conduct various tests. This same approach was proposed in the Permittee's June 18, 2010 version of the Work Plan, and was found unacceptable by NMED (*see* August 6, 2010 NOD).

On December 1, 2010, the Permittee submitted a separate plan to contain the LNAPL plume by proposing to pump and treat contaminated groundwater at the leading edge of the LNAPL plume. NMED will review this plan to determine whether it meets NMED's directives of April 2, 2010, and the NOD issued August 6, 2010, and otherwise proposes a sound technical approach. NMED's action on that plan will be provided under separate cover.

The Permittee must respond to this letter to my attention, with copy to Mr. Bill Olson of the NMED Ground Water Quality Bureau, and Mr. William Moats (NMED HWB, 5500 San Antonio NE, Albuquerque, NM 87109), on all correspondence and required plans and reports related to the Bulk Fuels Facility Spill, unless otherwise directed by NMED. All submittals and correspondence must be submitted in hardcopy and electronic format.

Please contact me directly at 505-476-6016 should you have any questions. Questions of a technical nature may also be directed to William Moats of my staff at (505) 222-9551.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

cc: J. Kieling, NMED HWB
W. Moats, NMED HWB
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File: Reading and KAFB 2010

