APPENDIX A

2010 Regulatory Correspondence between NMED HWB and the Air Force regarding the Kirtland AFB BFF Spill

THIS PAGE INTENTIONALLY LEFT BLANK

ATTACHMENT 1

April 2, 2010 Correspondence from NMED HWB to Colonel Michael S. Duvall, Base Commander, 377 ABW/CC Re: SWMUs ST-106 and SS-111, BFF Spill, Kirtland, AFB

THIS PAGE INTENTIONALLY LEFT BLANK

AR Doc # 3451

NEW MEXICO ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

BILL RICHARDSON
Governor

DIANE DENISH
Lieutenant Governor

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.nmenv.state.nm.us

RON CURRY
Secretary

SARAH COTTRELL
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 2, 2010

APR 19 2010

Colonel Michael S. Duvall
Base Commander
377 ABW/CC
2000 Wyoming Blvd. SE
Kirtland AFB, NM 87117-5606

Mr. John Pike
Director, Environmental Management Section
377 MSG/CEANR
2050 Wyoming Blvd., Suite 116
Kirtland AFB, NM 87117-5270

RE: SOLID WASTE MANAGEMENT UNITS ST-106 AND SS-111, BULK FUELS FACILITY SPILL
KIRTLAND AIR FORCE BASE
EPA ID# NMD9570024423, HWB-KAFB-10-004

Dear Colonel Duvall and Mr. Pike:

As you are aware, the U. S. Department of Defense Kirtland Air Force Base ("Permittee") is conducting an investigation of contaminated groundwater at the Bulk Fuels Facility Former Fuel Offloading Rack (Solid Waste Management Unit ["SWMU"] ST-106) and the associated Light Non-Aqueous Phase Liquid ("LNAPL") plume (SWMU SS-111, or Phase-Separated Hydrocarbon Bulk Fuels Facility Remediation) (collectively, the "Bulk Fuels Facility Spill"). Data submitted by the Permittee show that the contamination caused by the Bulk Fuels Facility Spill represents a significant threat to human health and the environment, particularly to well water in urban neighborhoods adjacent to Kirtland Air Force Base ("KAFB"). Despite the fact that this release of hazardous constituents was first discovered 10 years ago, the Permittee has not completely characterized the Bulk Fuels Facility Spill, nor conducted adequate remediation.

As stated in the New Mexico Environment Department ("Department") Ground Water Quality Bureau ("GWQB") letter enclosed with this letter, the GWQB has transferred oversight of the Bulk Fuels Facility Spill to the Hazardous Waste Bureau ("HWB"),

which will direct corrective action at the Bulk Fuels Facility Spill pursuant to the New Mexico Hazardous Waste Act ("HWA") NMSA 1978, §74-4-1 to 74-4-14 and the Hazardous Waste Management Regulations ("HWMR", 20.4.1 NMAC).

Releases of hazardous waste or hazardous constituents are subject to corrective action under Sections 3004(u) and (v) and 3008(h) of the Resource and Conservation Recovery Act "RCRA"; 42 U.S.C. §§ 6924(u) and (v) and 6928(h); Sections 74-4-4(A)(5)(h) and (i), 74-4-4.2(B), and 74-4-10(E) of the HWA; and the HWMR at 40 C.F.R. Part 264, Subpart F (incorporated by 20.4.1.500 NMAC).

Pursuant to 20.4.1 NMAC incorporating 40 CFR § 264.101(a), the Permittee must institute corrective action as necessary to protect human health and the environment for all releases of hazardous waste or constituents from any SWMU. Additionally, in accordance with 20.4.1 NMAC incorporating 40 CFR § 264.101(c), the Permittee must implement corrective actions beyond the facility boundary.

Section R.5 of the Hazardous and Solid Waste Amendments ("HSWA") Module IV of the Permittee's RCRA Permit states:

> The Permittee shall conduct those investigations of SWMUs previously identified with known or suspected releases of contamination as necessary to protect human health and the environment to: characterize the facility (Environmental Setting); define the source (Source Characterization); define the degree and extent of contamination (Contamination Characterization); and to identify actual or potential receptors.

Additionally, pursuant to Section R.5(b):

> The Permittee shall collect analytical data to completely characterize the waste and areas where waste have been placed, including: type, quantity, physical form, disposition (containment or nature of deposits), and the facility characteristics affecting releases.

And, in accordance with Section R.5(c):

> The Permittee shall collect analytical data on groundwater, soils, surface water, sediment, and subsurface gas contamination when necessary to characterize contamination from a SWMU. The data shall be sufficient to define the extent, origin, direction and rate of movement of the contaminant plumes.

Therefore, in accordance with Section K.1 of the HSWA Module IV of the Permittee's RCRA Permit, the Permittee is directed to immediately implement interim measures to remediate the LNAPL plume, to excavate and remove structures and contaminated soil in

the vadose zone at and in the vicinity of the Former Fuel Offloading Rack, to install additional wells, and continue operation of the existing soil-vapor extraction units as directed below. Additionally, pursuant to Section R.5 of Module IV of the Permit, the Permittee is directed to immediately complete characterization of contaminated soil and soil-gas in the vadose zone, and to immediately complete characterization of the dissolved-phase contamination in groundwater. Furthermore, in accordance with Section M.1 of Module IV of the Permit, the Permittee will be directed by NMED to conduct one or more Corrective Measures Evaluations. The Permittee shall comply with the detailed instructions specified below by the indicated deadlines.

A. REQUIREMENT FOR COMPLETING CHARACTERIZATION OF CONTAMINATION IN THE VADOSE ZONE

The Department finds that contaminant characterization is inadequate at the tank farm, the piping extending from the tank farm to the Former Fuel Offloading Rack, and areas in the vicinity of the Former Fuel Offloading Rack. More specific details on this finding are presented in the next two paragraphs.

Based on information provided by the Permittee, only four soil borings have been completed at the fuel tanks and no borings have been completed along the ancillary piping leading from the fuel tanks to the Former Fuel Offloading Rack. The four soil borings at the tanks were completed to shallow depths ranging from 25-48 feet. Diesel Range Organics ("DRO") contamination was detected in all four boreholes, with the highest concentrations (1800-2400 mg/kg) found in borehole SB-09. A number of hazardous constituents were also detected in soil samples from SB-09 and SB-06. Despite these findings, the Permittee did not determine the extent of contamination near the tanks. The latter is particularly notable given that the Permittee's *Stage 1 Abatement Plan Report* (February 8, 2006) contains the following recommendation (in Section 4.4):

> It is recommended that additional field investigation at the east side of the Bulk Fuels Facility be conducted to determine the full extent of petroleum hydrocarbons in soil and soil vapor beneath Tank 2422...Additional investigation will also determine whether release(s) associated with this tank are the source of sorbed-phase and vapor-phase petroleum hydrocarbons previously indentified in distal monitoring wells SVMW-13 and SVMW-15.

To date, the Permittee has not conducted the additional field investigation to determine the full extent of petroleum hydrocarbons and hazardous constituents in soil and soil vapor around the Bulk Fuels Facility.

The Permittee has also not completed characterization of the contaminated soil in the vicinity of the Former Fuel Offloading Rack, as previous investigative efforts seem to have been arbitrarily terminated once Total Petroleum Hydrocarbons ("TPH") concentrations in soil were found to be less than 100 mg/kg. Additional soil borings should have been completed to investigate the full

extent of soil contamination above background levels regardless of the concentration levels of the contaminants. Similarly, characterization of soil-gas contamination near the Former Fuel Offloading Rack is inadequate; investigative efforts appear to have been terminated once TPH concentrations were found to be below 1000 ppmv in the area. Additional soil-gas monitoring wells should have been installed to investigate the full extent of soil-gas contamination from the surface to groundwater, even in areas where the contamination is less than 1000 ppmv.

Thus, the Permittee has not adequately characterized LNAPL contamination in the vadose zone. Characterization must be complete to design and implement an appropriate final remedy. Accordingly, pursuant to the deadlines established below, the Permittee must:

1. Determine the amount of fuel that exists within the vadose zone as sorbed or residual liquid, or as soil gas.
2. Identify the source of the LNAPL fuel plume.
3. Describe the vadose zone hydrology, its relationship to observed and potential to-be-discovered groundwater contamination, and the potential for continuing contamination of groundwater by vadose zone contamination sources.
4. Characterize the geology and extent of contamination in the soil and soil gas to determine distribution, fate, and migration of contaminants.

Therefore, on or before **June 7, 2010**, the Permittee must submit to the Department for its review and approval a Vadose Zone Investigation Plan that describes the additional actions the Permittee will take to investigate the vadose zone hydrology and geology of the affected area, to identify and characterize the source of the releases at the Bulk Fuel Facility, and to identify the extent of soil and soil-gas contamination in the vadose zone from the surface to groundwater. The area covered under this Vadose Zone Investigation Plan must include the tank farm and the ancillary piping between the farm and the Former Fuel Offloading Rack. The Vadose Zone Investigation Plan must describe in detail all research, locations, depths and methods of exploration, field procedures, sampling and analysis of soil and soil gas and related quality control procedures. The Vadose Zone Investigation Plan shall also describe the results and the means (for example, cross-sections, plan views) by which these results will be reported after the investigation is completed, and a schedule for implementation of the work that complies with the compliance schedule in Table 1 of this letter.

Table 1. Compliance Schedule for Vadose Zone Investigation

Task	Date Due
Submit Vadose Zone Investigation Plan to the Department	June 7, 2010
Complete all subsurface-soil sampling and installation of all soil-gas monitor wells	Within 12 months after Department approval of Vadose Zone Investigation Plan

Report results for subsurface-soil sampling	Within 15 months after Department approval of Vadose Zone Investigation Plan
Complete first four quarters of soil-gas sampling and analysis	Within 24 months after Department approval of Vadose Zone Investigation Plan
Soil-gas sampling	Quarterly after well installations completed
Submit quarterly soil-gas monitoring reports to the Department	60 days after the quarter during which sampling occurred

Furthermore, in addition to any other locations the Permittee identifies, the locations listed in Table 2 of this letter shall be included in the Vadose Zone Investigation Plan and must be sampled for contaminants in soil and soil gas (all coordinates in this table are State Plane Coordinates in feet, NAD83). Soil samples 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. Each boring at each location shall be drilled from the surface to the water table, and each boring shall be completed as a permanent soil-gas monitoring well. All of 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. While the Permittee shall continue to analyze samples for TPH and hazardous constituents, the investigation shall not be limited to only those areas containing or suspected to contain TPH at concentrations of greater than 100 mg/kg (100 ppm) in soil or 1000 ppmv in soil gas. Instead, investigation of the Bulk Fuels Facility Spill shall be designed to determine the full extent of contamination above background levels regardless of contaminant concentration levels.

Table 2. Borehole locations for soil sampling and for conversion to soil-gas monitoring wells.

Location #	Easting	Northing	Characterization Purpose
1	1541119	1473793	Step out from Fuel Offloading Rack beyond 100 mg/kg contaminated zone
2	1540808	1473503	Step out from Fuel Offloading Rack
3	1541123	1473310	Step out from Fuel Offloading Rack
4	1541425	1473313	Step out from Fuel Offloading Rack
5	1541961	1473492	Path from Fuel Offloading Rack to LNAPL Plume
6	1542002	1473057	Piping
7	1541794	1473061	Piping
8	1542370	1473058	Piping
9	1541898	1473276	Path from Fuel Offloading Rack to LNAPL Plume
10	1541720	1473369	Step out from Fuel Offloading Rack

11	1541776	1473740	Step out from Fuel Offloading Rack
12	1541658	1473505	Path from Fuel Offloading Rack to LNAPL Plume
13	1542061	1472928	Fuel tanks
14	1542063	1472775	Fuel tanks
15	1542142	1472847	Fuel tanks
16	1541982	1472845	Fuel tanks
17	1542330	1472796	Fuel tanks
18	1542430	1472897	Fuel tanks
19	1542516	1472810	Fuel tanks
20	1542428	1472716	Fuel tanks
21	1541611	1473238	Piping

In addition to any other location identified by the Permittee, the locations listed in Table 3 of this letter shall also be included in the Vadose Zone Investigation Plan to be sampled for contaminants in soil gas (all coordinates in this table are State Plane Coordinates in feet, NAD83). Each boring at each location listed in Table 3 shall be completed as a permanent soil-gas monitoring well. All of 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.

Table 3. Locations for soil-gas monitoring wells.

Location #	Easting	Northing	Characterization Purpose
1	1543058	1474093	Characterize outside of LNAPL Plume
2	1543194	1474680	Characterize outside of LNAPL Plume
3	1542306	1474093	Characterize within LNAPL Plume
4	1541555	1475049	Characterize outside of LNAPL Plume
5	1541248	1474141	Characterize outside of LNAPL Plume
6	1542259	1472591	Characterize outside of LNAPL Plume
7	1540667	1472823	Characterize outside of LNAPL Plume
8	1542525	1475459	Characterize within LNAPL Plume
9	1542436	1474878	Characterize within LNAPL Plume

B. REQUIREMENT FOR COMPLETING CHARACTERIZATION OF DISSOLVED-PHASED CONTAMINANTS IN GROUNDWATER

The Permittee has not adequately characterized the dissolved-phase contamination in the groundwater and has not analyzed groundwater samples from wells located in the LNAPL plume area. The final remedy for the Bulk Fuels Facility Spill cannot be determined until this characterization work has been completed. Additionally, the Permittee has not installed any groundwater monitoring wells to investigate the vertical extent of the dissolved-phase groundwater contamination, the effects of vertical gradients, and the geology of the aquifer at any appreciable depth below the water table. The dissolved-phase plume is approaching one or more

Water Utility Authority well fields. Given that the pumping of water supply wells is known to induce vertical gradients in groundwater and can cause significant components of vertical flow in the vicinity of such wells, vertical characterization of groundwater quality and geology is required.

The leading edge and the eastern and western margins of the plume are undefined, and the nature and concentrations of contaminants in the core of the plume are poorly characterized because existing wells are located too far apart (generally at distances greater than 500 feet). Additionally, only one upgradient well has been installed that may yield groundwater samples that are free from contamination. Given the magnitude of this spill, several upgradient wells should be installed that are screened at different depths at and below the water table to ensure that all areas of contaminated groundwater have been located, and that the background wells are truly monitoring background water quality.

Therefore, on or before **July 7, 2010**, the Permittee must submit to the Department for its review and approval a Groundwater Investigation Plan that describes the additional actions the Permittee will take to characterize the nature, horizontal and vertical extent, and the fate and rate of migration of the groundwater contamination. The Groundwater Investigation Plan shall include construction details and the locations and depths of the groundwater monitoring wells to be installed, actions to characterize the geology and hydrogeology at and below the water table, and the groundwater flow direction and velocity. The plan shall also present details on field procedures, and the sampling and analysis of groundwater and related quality control. The Groundwater Investigation Plan shall describe the results, the means (*e.g.*, cross-sections, plan views) by which these results will be reported after the investigation is completed, and a schedule for implementation of the work that complies with the compliance schedule in Table 4 of this letter.

Table 4. Compliance Schedule for Groundwater Investigation

Task	Date Due
Submit Groundwater Investigation Plan to the Department	July 7, 2010
Complete installation of all wells	Within 12 months after Department approval of Groundwater Investigation Plan
Submit well installation report to the Department	Within 15 months after Department approval of Groundwater Investigation Plan
Complete first eight quarters of groundwater sampling and analysis	Within 36 months after Department approval of Groundwater Investigation Plan

Groundwater Sampling	Quarterly after well installations completed
Submit quarterly groundwater monitoring reports to the Department	60 days after the quarter during which sampling occurred

In addition to any locations the Permittee identifies, the Groundwater Investigation Plan shall also include a description of the installation of groundwater monitoring wells at the locations listed in Table 5 of this letter (all coordinates in this table are State Plane Coordinates in feet, NAD83). Three groundwater monitoring wells shall be installed at each of the cluster well locations listed in Table 5. The screen depths shown in Table 5 are distances (in feet) that the top of the screens shall be set below the water table. Screen lengths for wells shall not exceed 15 feet, with the exception that wells screened across the water table (those with screen depths of zero in Table 5) shall have screens 20 feet long, with no more than 15 feet of said screen length situated below the water table.

In addition to any other tools the Permittee identifies, the Groundwater Investigation Plan shall also include details describing the geophysical logging of all existing and new wells using induction (deep), neutron, and gamma (large crystal) tools. Geophysical logging at the cluster well locations listed in Table 5 is required in only the well at each location having the deepest screened interval.

Table 5. Cluster well locations and screen depths relative to the water table.

Location #	Easting	Northing	Screen Depths	Characterization Purpose
1	1542189	1476725	0, 15, 40	Plume margin
2	1541984	1476042	0, 15, 40	Plume margin
3	1543703	1476600	0, 15, 40	Plume margin
4	1543372	1475065	0, 15, 40	Plume margin
5	1543643	1477939	0, 15, 85	Leading edge and deep characterization
6	1541430	1472370	0, 15, 40	Background water quality
7	1542812	1473601	0, 15, 40	Plume margin
8	1542722	1477726	0, 15, 40	Leading edge
9	1543054	1477788	0, 15, 40	Leading edge
10	1543774	1477304	0, 15, 40	Leading edge
11	1541774	1473718	0, 15, 85	Plume core, deep delineation
12	1542362	1473801	0, 15, 85	Plume core, deep characterization
13	1542305	1474340	0, 15, 85	Plume core, deep characterization
14	1542736	1474715	0, 15, 85	Plume core, deep characterization
15	1542860	1475860	0, 15, 85	Plume core, deep characterization
16	1542189	1475207	0, 15, 85	Plume core, deep characterization
17	1541891	1473151	0, 15, 85	Plume core, deep characterization
18	1542203	1474071	0, 15, 85	Plume core, deep

				characterization
19	1542653	1475338	0, 15, 85	Plume core, deep characterization
20	1542535	1475975	0, 15, 85	Plume core, deep characterization
21	1543199	1475767	0, 15, 85	Plume core, deep characterization
22	1543068	1476494	0, 15, 85	Plume core, deep characterization

C. REQUIREMENT FOR INTERIM MEASURES

In its October 28, 2009 letter, the GWQB wrote:

> The New Mexico Environment Department (NMED) has determined, based on information generated by Kirtland Air Force Base (KAFB) during its investigations, that the scale and observed impact of the Light Non-Aqueous Phase Liquid (LNLAP) hydrocarbon contamination of groundwater associated with the SS-111 Bulk Fuels Facility constituting the majority of the KAFB ST-106 LNAPL plume has been largely defined. This plume of LNAPL hydrocarbons has been found to have contaminated groundwater over a substantial area that is the source of drinking water supplies for the City of Albuquerque and is also located in the vicinity of several public water supply wells. The volume of LNAPL hydrocarbons on groundwater, which has been estimated by KAFB to be in the millions of gallons, will take a substantial period of time to remediate. Currently, the majority of the LNAPL hydrocarbon plume is located off of KAFB property and is not being actively remediated.

The Permittee's records indicate that the LNAPL and dissolved-phase plumes have migrated horizontally a distance of about 0.5 mile and 0.9 miles, respectively, from the area of the Former Fuel Offloading Rack.

Interim measures are required to reduce or prevent the migration of contaminants, or to reduce or prevent human or environmental exposure to contaminants while long-term corrective action remedies are evaluated and implemented. Section K.1 of the HSWA Module IV of the Permit states:

> If during the course of any activity initiated under this module, the Administrative Authority determines that a release or potential release of hazardous constituents from a SWMU poses a threat to human health and the environment, the Administrative Authority may specify interim measures. The Administrative Authority will determine the specific measure, including potential permit modifications, and the schedule for implementing the required measures.

Additionally, Section K.2 of Module IV of the Permit states:

The following factors may be considered by the Administrative Authority in determining the need for interim measures.

1. Time required to develop and implement a final remedy;
2. Actual and potential exposure to human and environmental receptors; and
3. The potential for the further degradation of the medium absent interim measures.

The Department has determined that the Bulk Fuel Facility Spill poses a threat to human health and the environment, and furthermore, endangers the groundwater resource – including water supply wells – relied upon by the Albuquerque Bernalillo County Water Utility Authority for delivery of safe drinking water to its customers. The contamination also threatens KAFB water supply wells, and those that supply the Veterans Administration ("VA") Hospital. The large size of the LNAPL plume and its proximity to these water supply wells requires that urgent action be taken to prevent the LNAPL plume from contaminating more of Albuquerque's drinking-water supply.

The Permittee has estimated the volume of fuel released from the Bulk Fuels Facility to range from about 1-2 million gallons, but the actual volume could be considerably larger because characterization of the vadose zone is inadequate. For example, the Department has estimated the volume of sorbed fuel at or greater than 100 ppm in soil to be about 4.8 million gallons; this does not include fuel in soil gas, fuel dissolved in groundwater, and floating fuel forming the LNAPL plume. The Department has estimated the fuel included in the LNAPL plume to be approximately 3 million gallons, giving a total volume of fuel sorbed to soil and that contained within the LNAPL plume at nearly 8 million gallons. The Permittee's records indicate that it has installed and is operating "interim ICE SVE" units on the Permittee's property; however, these four soil-vapor extraction (SVE) units are not an adequate interim measure to address the existing ground water contamination, including the LNAPL plume that has migrated beyond the facility boundary. From April 2003 to September 2009, these SVE units have extracted an estimated 286,600 gallons of fuel. From April through September 2009, the average extraction rate has declined by 25 per cent. The average extraction rate for each SVE unit is about 2,975 gallons per month.

At the rate of extraction achieved so far by the existing SVE units, the operation of these units would take over 14 years to remove 2 million gallons of fuel. This length of time is unacceptable because additional groundwater within the capture zone of Water Utility Authority water supply wells could become contaminated before the remediation could be completed. Furthermore, should the Department's calculations prove to be more accurate than the Permittee's estimated volume of fuel, it would take over 56 years for the remediation of the fuel to be completed.

Additionally, although the Permittee knows that considerable volumes of fuel have leaked from the Former Fuel Offloading Rack, the Permittee has not removed all of the

structures associated with the Former Fuel Offloading Rack (mostly the underground portions of the original structures), and has not excavated and removed contaminated soil around the Former Fuel Offloading Rack. The Permittee has instead abandoned the structures and contaminated soil in place. Soil containing considerable amounts of sorbed fuel, thus containing high concentrations of hazardous constituents, must exist at the Former Fuel Offloading Rack at shallow depths, posing a continuing source of contamination and threat to the groundwater resource.

Therefore, on or before **June 7, 2010,** the Permittee must submit to the Department for its review and approval an Interim Measures ("IM") Plan that describes what immediate actions it will take to remediate and stop the migration of the LNAPL plume. The IM Plan must also describe excavation and removal of all structures of the Former Fuel Offloading Rack, including the underground components, and the excavation and removal of contaminated soil at and in the vicinity of the Former Fuel Offloading Rack to a depth of at least 20 feet. The IM Plan must also include an implementation schedule showing that remediation of the LNAPL plume will be completed within five years of the Department's approval of the IM Plan, and that excavation and removal of structures and contaminated soil at and in the vicinity of the Former Fuel Offloading Rack will be completed within one year of the Department's approval.

Furthermore, on March 16, 2010, the Permittee sent a *Stage 2 Abatement Plan Modification Addendum* (dated March 16, 2010) concerning the proposed installation of three additional offsite groundwater monitoring wells. The March 16 submittal does not address the deficiencies identified by the GWQB in its letters of June 23 and October 28, 2009. This plan would not adequately characterize the LNAPL plume, the dissolved-phase groundwater contamination, or contaminated soil and soil gas at the Bulk Fuels Facility. However, given the urgency to complete characterization and implement an effective remedy, the NMED nevertheless approves the March 16, 2010, submittal as a second and separate interim measure, subject to the modifications described herein:

1. The March 16 plan proposes that well screens are to be constructed with lengths of 25 feet or more. Screen lengths for the wells shall not exceed 20 feet, with 15 feet of screen situated below the water table, and 5 feet of screen constructed above the water table.
2. The March 16 plan proposes that wells completed in the area of the LNAPL plume will not be developed after installation, and proposes that groundwater samples will not be acquired for laboratory analysis from wells located within the area of the LNAPL plume. Although existing wells within the area of LNAPL plume have in the past served only as sampling points to measure LNAPL thickness and as soil-vapor extraction points, these wells must now also be available to sample groundwater below the floating LNAPL so that concentrations of dissolved-phase contaminants can be assessed in this area. This same requirement will also apply to all future wells installed to address the Bulk Fuels Facility Spill, including the wells required under this letter. Thus, all wells that address the Bulk Fuels Facility Spill, including those located within the LNAPL

plume area, shall be properly developed to reduce turbidity and to remove residual drilling fluids (if any).

3. Groundwater at all wells within the LNAPL plume shall be sampled for laboratory analysis of hazardous constituents (volatile and semi-volatile organic compounds) and TPH after the wells are developed.
4. Proposed wells KAFB-10626 and KAFB-10628 shall be installed across the water table at the locations proposed in the March 16 plan. These two wells correspond to locations #5 and 13, respectively, in Table 5 above.
5. Proposed well KAFB-10627 shall be installed at location #6 listed in Table 5 above, which is a different location than that proposed by the Permittee in the March 16 submittal.
6. A tremie pipe shall be used to install the filter pack and seal for each well, and to place grout.
7. Grout shall be placed in lifts, with the first lift no greater than 100 feet in length and subsequent lifts no greater than approximately 200 feet. All lifts shall be allowed to dry until stable before the next lift is placed.
8. The March 16 plan does not contain a schedule for implementation. The March 16, 2010, plan shall be implemented **within two weeks** of approval from the City of Albuquerque to access the City property (e.g., Bullhead Park), to the extent access from the City is required for well installation. The Permittee shall otherwise implement the submittal **immediately**. All work shall be completed no later than **July 6, 2010**, or **90 days** after required access from the City is granted, whichever is later. Completion includes development of all new and existing wells that have not been previously developed, and the sampling of all wells within the LNAPL plume.
9. Sampling results (from item #3) above shall be reported to the NMED in writing on October 5, 2010, or 120 days after required access from the City is granted, whichever is later.

Table 6. Compliance Schedule for Interim Measures

Task	Date Due
Submit Interim Measures Plan to the Department	June 7, 2010
Complete excavation and removal of structures and soil at Former Fuel Offloading Rack	Within one year of approval of Interim Measures Plan
Complete remediation of LNAPL plume	Within five years of approval of Interim Measures Plan

Implement March 16, 2010 Stage 2 Abatement Plan Modification Addendum with required modifications	Immediately, except within two weeks of gaining permission for that portion of the March 16 Plan that requires access to City property.
Submit report to the Department on well installations conducted under March 16 Plan	July 6, 2010, or 90 days after required access from the City is granted, whichever is later
Submit report to the Department on groundwater sampling results conducted under March 16 Plan	October 5, 2010, or 120 days after required access from the City is granted, whichever is later

Until such time that the IM Plan is approved by the NMED, the Permittee shall continue to operate the four SVE units already in service 24 hours per day, 7 days a week, except when necessary to perform maintenance or repairs. If maintenance or repairs are necessary, the maintenance or repairs shall be completed as quickly as practicable, and the unit returned to service immediately after maintenance or repairs are completed. Any maintenance or repairs that will take more than 3 calendar days shall be reported in writing to the Department within 24 hours of discovery that the maintenance or repairs will take more than 3 days. The Permittee shall explain in the report why the maintenance or repairs will take more than 3 calendar days and why the delay is beyond the control of the Permittee.

D. REQUIREMENT TO CONDUCT A CORRECTIVE MEASURES EVALUATION

In accordance with Section M.1 of HSWA Module IV of the Permit, if the Administrative Authority has reason to believe that a SWMU has released concentrations of hazardous constituents, or if the Administrative Authority determines that contaminants present a threat to human health and the environment given site-specific exposure conditions, the Administrative Authority may require a Corrective Measures Study (herein referred to a Corrective Measures Evaluation, or "CME"). With this letter, the Department hereby notifies the Permittee that it is required to conduct a CME for the Bulk Fuels Facility Spill. The CME shall be conducted to develop remedial alternatives that, if implemented, would be appropriate to effectively arrest and remediate contamination in the vadose zone, the LNAPL plume, and the dissolved-phase groundwater contamination in a reasonable period of time. A CME Report shall be prepared that describes in detail the results of the CME. The CME Report shall be submitted to the Department within 180 days after the Department notifies the Permittee that characterization of the Bulk Fuels Facility Spill has been completed and approved by the Department. The CME and CME Report shall also be completed in accordance with Sections O and S of HSWA Module IV of the Permit.

E. REPORTING REQUIREMENTS

The investigation plans required under this letter shall 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 in a legible manner, and clearly showing which borings/wells contributed data towards construction of the maps and cross-sections and which did not. 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 shall also be included in the reports and plans. For soil-gas monitoring wells, tables and graphs shall also be included providing trends of TPH concentrations versus time for the depths below ground surface of 25, 50, 150, 250, 350, and 450 feet.

F. CONCLUSIONS

The requirements in this letter to conduct corrective action at the Bulk Fuel Facility Spill are mandatory. If the Permittee fails to comply with the directives of this letter, the Department may take the following actions, or some combination of the following actions, to enforce these requirements: 1) issue a compliance order under section 74-4-10 of the HWA seeking injunctive relief or civil penalties for noncompliance; 2) file a civil action under sections 74-4-10 and 74-4-10.1(E) of the HWA or section 7002(a) of RCRA, 42 U.S.C. § 6972(a), seeking injunctive relief or civil penalties; or 3) file an action seeking criminal penalties under section 74-4-11 of the HWA. This list of authorities is not exhaustive and NMED reserves its rights to take any action authorized by law to enforce the requirements of the HWA and the HWMR.

The Permittee shall respond directly to my attention, with copy to Mr. Bill Olson of the GWQB, 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 upon receipt of this letter, unless otherwise directed by HWB. All submittals and correspondence must be submitted in hardcopy and electronic format. Assessment of fees for the submittal of corrective action documents pursuant to 20.4.2. NMAC shall be made under separate cover.

If you have any questions or comments concerning the technical matters in this letter, you may contact William McDonald or Sid Brandwein of my staff at (505) 222-9582 and (505) 222-9504, respectively. If you have other questions or comments, I may be contacted directly at 505-476-6000.

Sincerely,

James P. Bearzi
Chief
Hazardous Waste Bureau

cc: M. Leavitt, Director, NMED WWMD
J. Kieling, NMED HWB
W. Moats, NMED HWB
B. McDonald, NMED HWB
S. Brandwein, NMED HWB
B. Olson, Chief, NMED GWQB
A. Puglisi, NMED GWQB
B. Swanson, NMED GWQB
L. Barnhart, NMED OGC
B. Gallegos, AEHD
B. Gastian, ABCWUA
L. King, EPA-Region 6

File: Reading and KAFB 2010

APR 19 2010

ATTACHMENT 2

August 6, 2010 Correspondence from NMED HWB to Colonel Robert L. Maness, Base Commander, 377 ABW/CC Re: SWMUs ST-106 and SS-111, BFF Spill, Kirtland, AFB

THIS PAGE INTENTIONALLY LEFT BLANK

NEW MEXICO ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

BILL RICHARDSON
Governor

DIANE DENISH
Lieutenant Governor

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.nmenv.state.nm.us

RON CURRY
Secretary

SARAH COTTRELL
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 6, 2010

Colonel Robert L. Maness
Base Commander
377 ABW/CC
2000 Wyoming Blvd. SE
Kirtland AFB, NM 87117-5606

Mr. John Pike
Director, Environmental Management Section
377 MSG/CEANR
2050 Wyoming Blvd., Suite 116
Kirtland AFB, NM 87117-5270

RE: BULK FUELS FACILITY SPILL, SWMUS ST-106 AND SS-111
DIRECTIVE FOR CONDUCTING INTERIM MEASURES AND NOTICE OF DISAPPROVAL
INTERIM MEASURES WORK PLAN, JUNE 2010;
VADOSE ZONE WORK PLAN, JUNE 2010;
GROUNDWATER INVESTIGATION WORK PLAN, JUNE 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 contamination caused by the Bulk Fuels Facility Spill at Kirtland Air Force Base (KAFB) represents a significant threat to human health and the environment, particularly to well water that supplies drinking water to portions of Albuquerque, KAFB, and the Veterans' Administration Hospital. Even though this release was first discovered 10 years ago, the U. S. Air Force (Permittee) has not characterized the nature and extent of Bulk Fuels Facility Spill, nor conducted adequate remediation. The threat posed by this release demands immediate and aggressive action as called for in the New Mexico Environment Department's (NMED's) April 2, 2010 letter.

The NMED has reviewed the Interim Measures Work Plan (June 2010), Vadose Zone Work Plan (June 2010), and Groundwater Investigation Work Plan (June 2010) regarding the KAFB Bulk Fuels Facility Spill, Solid Waste Management Units (SWMUs) ST-106 and SS-111. The plans were submitted in response to the NMED's letter of April 2, 2010, which concerned the need for

additional site characterization and interim measures to remediate contamination in groundwater, source areas, and fuel floating on the water table.

NMED finds that all three plans are deficient. This Notice of Disapproval (NOD) is issued to the Permittee with the intent that the Permittee correct the deficiencies identified herein. This NOD includes general comments that apply to all three documents, and general and specific comments concerning deficiencies found in each of the individual plans. These comments comprise Part 1 of this letter.

Due to the urgent need to accelerate certain aspects of remediation and characterization, the Permittee is also directed herein to implement interim measures in the form of additional soil vapor extraction and to take various other actions including establishing sentry groundwater monitoring wells and providing NMED certain critical information. This direction comprises Part 2 of this letter, and also sets forth requirements related to well construction, sampling of environmental media, field and laboratory quality assurance, and reporting.

PART 1

A. Deficiencies Common to All Three Plans

1. Appendix A of the Vadose Zone and Interim Measures Work Plans and Appendix D of the Groundwater Investigation Work Plan – Appendix A and Appendix D are exactly the same plan (about 500 pages, dated April 2004), appended to and occupying 80% or more (by number of pages) of the Vadose Zone, Interim Measures, and Groundwater Investigation Work Plans. Although the plan presented in Appendices A and D is voluminous, it is only a general plan that lays out the Permittee's internal requirements for conducting corrective action for the entire base. Furthermore, the copies of this plan provided to the NMED are missing figures (Figure 3-4), have their own appendices that are noted as "to be provided at a later date", and, in places, have outdated information (Table B7.2-1, page B-177 of Appendix B of Appendix A).

Because Appendices A and D are not specific to the Bulk Fuels Facility Spill, they do not describe in sufficient detail how, for example, project organization, data management, and quality assurance will be implemented under the Vadose Zone, Groundwater Investigation, and Interim Measures Work Plans. For example, under the project management plan, the organizational chart only shows KAFB management. The field sampling plan discusses the various types of field quality control (QC) samples that could be utilized during an investigation, but does not set forth the specific types of QC samples that should be prepared or collected for the Bulk Fuels Facility Project. Furthermore, because it is only a general plan for the entire base, the plan does not commit to the collection of QC samples for any project.

Appendices A and D must be deleted from the Vadose Zone, Groundwater Investigation, and Interim Measures Work Plans. They have little value because they do not contain the appropriate level of detail for characterization and clean up of the Bulk Fuels Facility Spill and do not

commit the Permittee to do anything. The Permittee shall revise the Vadose Zone, Groundwater Investigation, and Interim Measures Work Plans to include the appropriate level of detail and commitment on project organization, data management, and field and laboratory quality assurance.

2. Appendix B of the Vadose Zone and Interim Measures Work Plans and Appendix A of the Groundwater Investigation Work Plan – These appendices include only a 2006 NMED guidance document. The guidance is outdated and adds little, if any, value to the Vadose Zone, Interim Measures, and Groundwater Investigation Work Plans, and thus, must be deleted from all three plans. NMED guidance documents may be cited, if necessary, in future submittals.
3. Community Relations - The community relations plan is not included in Appendix A of the Vadose Zone and Interim Measures Work Plans and Appendix D of the Groundwater Investigation Work Plan. Instead, the appendices state "*Appendix I, Community Relations Plan, (to be provided at a later date)*". The Permittee shall revise the Vadose Zone, Interim Measures, and Groundwater Investigation Work Plans to include a community relations plan specific to the Bulk Fuels Facility spill. The plan must specify how the Permittee will inform the public, including the Albuquerque Bernalillo County Water Utility Authority (WUA), the City of Albuquerque, and the Veterans Administration of progress made on characterization and clean up of the Bulk Fuels Facility spill.

4. Schedules – Characterization and clean up of the Bulk Fuels Facility Spill is expected to be a large, complex, and interactive project with many deadlines that will have to be met by the Permittee. The Gantt charts provided in the Interim Measures, Groundwater Investigation, and Vadose Zone Work Plans do not contain sufficient detail and are unacceptable because they over simplify field work on the schedules as only a few tasks. A Gantt chart showing all major tasks, their dependency if any on other tasks, and their early/late starts, early/late completions and critical paths must be provided in each of the plans. NMED expects that charts of sufficient detail would likely require presentation on sheets larger than 11" x 17".

The Permittee must also submit to the NMED a Gantt chart that integrates all of the work to be done under the three plans. This Gantt chart must be submitted with the Vadose Zone Work Plan.

5. Organization - The organization plans in the Interim Measures, Groundwater Investigation, and Vadose Zone Work Plans only include mention of a project manager and a field team manager, and again reference the general site plan under Appendix A of the Vadose Zone and Interim Measures Work Plans and Appendix D of the Groundwater Investigation Work Plan. NMED notes that there are personnel mentioned by name under the Project Management Plan of Appendix A and Appendix D that have not worked for the Permittee at KAFB for the last several years.

It is likely that more than a project manager and a field team manager will be required to manage and execute a project of this size and complexity. Furthermore, it is unclear if there will be a separate field team manager for different tasks, such as conducting geophysical logging, drilling

and installation of wells, operating and maintaining soil vapor extraction (SVE) units, and sampling of environmental media. Also, the plans do not include details on the responsibilities and the qualifications of the personnel (by position) that will be involved.

Simply stating that a kick off meeting " ...will outline roles and responsibilities of all participants..." is not acceptable. It must be clearly understood in writing prior to project start who (by position) will be responsible for overseeing and conducting the myriad of events that need to happen such as field work, interpretation and management of various data, data validation, updating of the conceptual site model, communicating and reporting, and so forth. The Permittee must revise the Interim Measures, Groundwater Investigation, and Vadose Zone Work Plans to correct these deficiencies.

6. Data Management - The Data Management Plan provided in Appendix D of Appendix A of the Vadose Zone and Interim Measures Work Plans and Appendix D of Appendix D in the Groundwater Investigation Work Plan is a general plan for entire base (see Comment #1 of Section A, Part 1) and, thus, is not specific to the Bulk Fuels Facility Spill. The plan specifically fails to provide detail concerning the types of data that are to be managed, schedules for data submittals and entries into the database, how accuracy and completeness of the data will be ensured, and data availability to the NMED. The Permittee must revise the Interim Measures, Groundwater Investigation, and Vadose Zone Work Plans to correct these deficiencies.

7. Identification of and Approach to Addressing Data Gaps - Section 1.2 of each of the plans states "following previous investigations at the BFF, data gaps were identified...". Because these work plans are meant at a minimum to address data gaps identified in NMED's letter of April 2, 1010, the Permittee must list the data gaps that apply to each of the three plans, as appropriate for the topic of the plan, and indicate where in each of the plans the data gaps are addressed. The Permittee must 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 in each the document these data gaps are addressed.

8. Extent of Contamination and Clean Up Criteria – The extent of contamination in the various media (soil, soil vapor, groundwater) shall be based upon determining at what locations hazardous constituents occur at levels that exceed approved background concentrations. This was stated in the NMED's letter of April 2, 2010, and applies to all RCRA facilities in New Mexico that must conduct correction action.

Regarding clean up criteria, any soil contamination left in place within 20 feet of the surface must meet NMED's risk requirements for an acceptable level of risk for all hazardous constituents (10^{-5} for carcinogens and Hazards Index < 1 for noncarcinogens under a residential land-use scenario). Any soil contamination left in place at any depth must also have sufficiently low concentrations of hazardous constituents to be protective of groundwater. The Permittee may use the NMED's Soil Screening Levels in lieu of conducting a baseline risk assessment to determine the risk of contaminants.

While the use of total petroleum hydrocarbons (TPH) as an indicator of contamination is convenient for field screening, the risk to human health and the environment must be assessed through the use of laboratory analysis of hazardous constituents (e.g., benzene, toluene, ethylene dibromide (EDB), naphthalene, xylenes). The Permittee must revise the Interim Measures, Groundwater Investigation, and Vadose Zone Work Plans accordingly.

9. Site Specific Conceptual Model - The plans continue to provide what appears to be an outdated conceptual model of geologic, hydrologic, and contaminant conditions. However, regardless of the use of current data or the lack thereof, graphical representations of the conceptual model are of poor quality because the graphics are not always legible, are often too small to convey details, don't present sufficient numbers of cross-sections, and rely too much on the presentation of cartoons in lieu of detailed and accurate drawings (for example, Figures 2-8 and 2-9 in the Groundwater Investigation Work Plan).

NMED expected more in the discussion of site specific geology, as what was provided is similar to that presented in reports for the last 8 years or so. 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 must be included 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 suggests that the geophysical logs, especially the electric logs, for KAFB-0115, KAFB-10624, KAFB-16 and Ridgecrest-3 wells would be useful for assisting in the interpretation of the stratigraphy of the area of interest, as these logs clearly show certain stratigraphic horizons in the vadose zone that are distinctive and widespread units ("marker beds"). The site-specific conceptual model in the Interim Measures, Groundwater Investigation, and Vadose Zone Work Plans must be revised to correct the above noted deficiencies.

10. Failure to Provide Graphics and Data Submittals – Section E of NMED's April 2, 2010 letter states "The investigation plans required under this letter shall 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 in a ***legible*** (emphasis added) manner, and clearly showing which borings/wells contributed data towards construction of the maps and cross-sections and which did not. 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 shall also be included in the reports and plans. For soil-gas monitoring wells, tables and graphs shall also be included providing trends of TPH concentration versus time for the depths below ground surface of 25, 50, 150, 250, 350, and 450 feet."

Many of the figures in the Interim Measures, Groundwater Investigation, and Vadose Zone Work Plans are illegible and the required tables and graphs were not included, or were not provided in the format required. These tables and graphs are necessary to assess the adequacy of proposed

locations of borings/wells/SVE units. These tables and graphs of the required types, formats, and in legible form must be included in the revised Interim Measures, Groundwater Investigation, and Vadose Zone Work Plans.

11. Quality Assurance (QA)/Quality Control (QC) plan - The Quality Assurance Plan provided in Appendix D of Appendix A (or Appendix D of Appendix D in the GW Plan) is a general plan for the entire base (see Comment #1, Section A, Part 1 of this letter) and is not specific to the Bulk Fuels Spill Project. The Interim Measures, Groundwater Investigation, and Vadose Zone Work Plans must specify exactly what field and laboratory quality control samples are to be prepared or collected, as appropriate, and other aspects about quality control that are important to the Bulk Fuels Facility project, including the quality control targets that will be considered acceptable for each of the analytes of concern for each given media. The Permittee must revise the Interim Measures, Groundwater Investigation, and Vadose Zone Work Plans to correct these deficiencies.

12. Certification Statements - The Vadose Zone, Interim Measures, and Groundwater Investigation Work Plans and associated transmittal letters do not contain the required signed certification statement under RCRA and the New Mexico Hazardous Waste Act. Pursuant to 20.4.1.900 NMAC, incorporating 40 C.F.R. § 270.1 1 (d)(1), all plans and reports shall include a certification, signed by a chief or senior executive officer of the Facility stating:

> I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

The revised Vadose Zone, Interim Measures, and Groundwater Investigation Work Plans or associated transmittal letters must include this signed certification.

13. Waste Management - The Waste Management Plan provided in Appendix E of Appendix A of the Vadose Zone and Interim Measures Work Plan, and Appendix E of Appendix D in the Groundwater Investigation Work Plan) is a general plan for entire base (see Comment #1, Section A, Part 1 of this letter) and is not specific to the Bulk Fuels Facility Spill project.

Investigation Derived Waste (IDW) includes, but is not limited to, general refuse, drill cuttings, excess sample material, water (e.g., decontamination, development, purge), spent materials, and used disposable equipment generated during the course of investigation, corrective action, or monitoring activities. All IDW shall be properly characterized and disposed of, and otherwise

managed in accordance with all federal, state, and local laws and regulations. The Permittee shall include a description of the anticipated IDW management process as a revision to the Interim Measures, Groundwater Investigation, and Vadose Zone Work Plans.

B. Interim Measures Work Plan

1. General Comments on Interim Measures Work Plan

The Interim Measures Work Plan was to address two major requirements of NMED's letter of April 2, 2010: 1) remove the Fuel Offloading Rack and excavate to a depth of 20 feet contaminated soil surrounding the Fuel Offloading Rack; and 2) conduct interim measures to remediate the LNAPL plume within five years. This Part (Part 1) of this letter addresses the deficiencies on addressing the first requirement; Part 2 addresses the second requirement to immediately take action to remediate the LNAPL plume floating on the groundwater. Rather than complying with NMED's April 2, 2010 direction to take immediate action vis à vis LNAPL remediation, the Permittee proposes characterization of the vadose zone for some unspecified time period, followed later by SVE. More specifically, the Interim Measures Work Plan includes: testing six wells to determine LNAPL transmissivity (Tn); conducting air sparging and multi-phase extraction pilot tests, and conducting characterization studies using PneuLog tests.

NMED emphasizes that interim measures are actions quickly taken to reduce or prevent the migration of contaminants, or reduce or prevent exposure to contaminants while long-term remedies are evaluated. While characterization studies may be useful for improving remediation efforts, or for proposing and designing a final remedy, interim measures for remediating LNAPL floating on groundwater need to be implemented immediately. Any effort to successfully remove LNAPL floating on groundwater must also involve the removal of LNAPL from the source(s) and fuel percolation areas within the vadose zone.

2. Specific Comments on Interim Measures Work Plan

1. Page 2-10, Section 2.4 – This section of the plan indicates that the Permittee is preparing a report on indoor air quality, and that the report is currently in draft. A copy of the final indoor air quality report must be provided to the NMED by **October 6, 2010**, and as indicated in the Compliance Schedule of Table 5 of this letter.
2. Page 3-1, Section 3 - Throughout Section 3 (for example, Sections 3.2, 3.2.2, 3.4.1, 3.4.2, 3.5) the Permittee states its intent to characterize and excavate only soils with "mobile LNAPL", and to leave any other contaminated soil for later remediation under the Corrective Measures Implementation Plan (CMI), which the Permittee referred to as a Corrective Measures Evaluation (CME). The term "mobile LNAPL" was coined by the Permittee and apparently means soil containing such a high concentration of fuel contamination that the soil is dripping wet with fuel.

The reasons given by the Permittee not to excavate other contaminated soils (soil without mobile LNAPL) is that a risk assessment would have to be developed separately for such soils, and the Permittee expresses its desire to delay excavation of such soils until long-term corrective actions

are initiated for the site. Due to the urgent need for action at this site, such an approach is not acceptable. The Permittee can rapidly develop target clean up goals based on NMED's risk requirements noted above, or simply use NMED's soil screening levels for hazardous constituents. Soils do not need to be dripping wet with fuel to pose a risk to human health or the environment. NMED estimates that a Corrective Measures Implementation Plan will not be approved for at least several years because of the inadequate state of site characterization today. Leaving contaminated soil in the ground that poses a significant risk to human health or the environment for what will likely be a fairly long time period before long-term corrective actions are initiated is unacceptable. As indicated in Comment #8 in Section A of Part 1 of this letter, all contaminated soil to a depth of 20 feet that represents an unacceptable risk to human health or the environment shall be excavated and removed from the Fuel Offloading Rack area.

As mentioned above, due to the urgent need to accelerate remediation, the Permittee is directed in Part 2 of this letter to implement interim measures, which includes removal of the remaining components of the Fuel Offloading Rack and excavation of contaminated soil. This work shall be completed in accordance with the Interim Measures Work Plan as modified by the requirements of this letter and in accordance with the Compliance Schedule in Table 5 of this letter.

3. Page 3-2, Section 3.2.2 – This section indicates that soil samples will be analyzed in the laboratory only if samples do not respond to a field test kit. This is an unacceptable approach. The Permittee shall use laboratory analysis all soil samples in shallow borings for TPH, VOCs, SVOCs, and lead.

4. Page 3-4, Section 3.4.2 – This section indicates that a detailed excavation plan for the Fuel Offloading Rack will be submitted to the NMED at a later date. NMED's April 2, 2010 letter intended for the Interim Measure Work Plan to be the detailed plan.

The excavation of contaminated soil and removal of structures at the Fuel Offloading Rack is a relatively simple "dig and haul" operation, and represents by far the easiest of the two major interim measures that the Permittee was directed to accomplish in NMED's letter of April 2, 2010. NMED requires the Permittee to begin excavation and removal of structures at the Fuel Offloading Rack immediately (see Section A of Part 2 of this letter).

5. Page 4-1, Section 4.2 – In part, this section states "Kirtland AFB proposes to install an IRM to remove, to the extent practicable within five years of work plan approval, mobile LNAPL present at the water table that has the potential to migrate along the water table and potentially further endanger the regional aquifer that provides drinking water for ABCWUA. Immobile LANPL and sorbed and dissolved fuel contamination in groundwater will be addressed by the future CME."

The NMED finds several unacceptable concepts related to these statements. First, as previously mentioned, NMED does not agree with the Permittee-coined terms "mobile LNAPL" and "immobile LNAPL." The point of the interim measure is to clean up contamination (LNAPL)

that poses a threat to groundwater, regardless of contaminant concentrations. Even LNAPL that is not migrating along the water table has the potential to contaminate groundwater with concentrations of hazardous constituents that are at unsafe levels for human consumption. Second, the phrase "to the extent practicable" suggests that the Permittee has already admitted defeat without even attempting to clean up the groundwater and the floating LNAPL. Third, the LNAPL floating on the water table endangers water supply wells in addition to those operated by the WUA. Lastly, like the cleaning up of contaminated soil around the Fuel Offloading Rack, the Permittee is stating its desire to delay clean up for at least several years while a final remedy through an approved CMI Plan is implemented, which is unacceptable. The Permittee must revise the Interim Measures Work Plan to remove the above-noted deficiencies.

6. *Page 4-4, Section 4.6* - In the last paragraph the Permittee states that "Routine system optimization will be performed … to maintain the highest mass extraction rate…"

The Permittee shall revise this section to explain in detail how the system will be optimized.

7. *Page 5-1, Section 5* - The Permittee states: "Vadose zone interim remedial measures will be implemented if data collected during the PneuLog profiling, supplemented by results of the concurrent vadose zone investigation, identify the presence of potentially mobile LNAPL within the vadose zone."

As mentioned above, the NMED does not agree with the Permittee-coined terms "mobile LNAPL" and "immobile LNAPL." It should be inarguable that fuel infiltrated from near or at the ground surface and has percolated through the vadose zone to groundwater. Some fuel is likely still draining to groundwater. However, hazardous constituents can still migrate to groundwater as vapor even in areas where the draining of liquid fuel to groundwater has stopped or never took place. The Permittee must revise the Interim Measures Work Plan to indicate that remediation of the vadose zone will be conducted to accomplish clean up of LNAPL floating on the groundwater, regardless of whether fuel-saturated conditions exist in the vadose zone in a given area.

8. *Page 5-2, Section 5.2* - The fourth paragraph states: "PneuLog will be performed at three locations…starting from the point(s) of release to the water table."

Figure 5-1 shows the proposed locations for PneuLog testing about 750 feet northeast of the Fuel Offloading Rack and approximately 750 feet north of the southern extent of the LNAPL plume that is floating on groundwater. According to the conceptual model provided in the Interim Measures Work Plan, the proposed locations for PneuLog testing could lead to missing the path of percolation that the fuel took to groundwater.

The Permittee must revise the Interim Measures Work Plan to include some PneuLog testing in the fuel percolation area. See Comment #4 in Section C of Part 1 of this letter for information on the area NMED has identified as the fuel percolation area. Indicate also in the Interim Measures Work Plan the significance of using three locations for PneuLog testing and explain in more

detail how the air flow potential of the geologic units will be assessed and used in the design to optimize SVE.

The Interim Measures Work Plan shall also be revised to indicate that geologic and geophysical (induction, gamma, and neutron) logs will be made for the boreholes used for PneuLog testing.

9. Figures. Figures 2-2 through 2-5 are very difficult, and in some cases impossible to read. Cross-section A-A' is not the view seen in Figure 2-8.

The Permittee shall revise the Interim Measures Work Plan to include corrected and legible figures.

C. Vadose Zone Work Plan

1. General Comments on Vadose Zone Work Plan

In NMED's letter of April 2, 2010, the Permittee was directed to submit a Vadose Zone Investigation Plan that describes the additional actions the Permittee will take to investigate vadose zone hydrology and geology, to identify and characterize the source of the releases at the Bulk Fuel Facility, and to identify the extent of soil and soil-gas contamination in the vadose zone from the surface to groundwater. The Vadose Zone Plan was to describe in detail all research, locations, depths and methods of exploration, field procedures, sampling and analysis of soil and soil gas and related quality control procedures, the results and the means by which the results are to be reported, and a schedule of the work.

The Vadose Zone Work Plan that has been submitted is inadequate to accomplish the objectives established in NMED's letter of April 2, 2010. A major reason is that the proposed borings and soil-vapor wells are located too far apart to characterize in adequate detail the contaminant and geologic conditions in the vadose zone. NMED therefore directs herein a general increase in the number of sampling points. The Permittee shall revise the Vadose Zone Work Plan to include all of the soil borings and soil-vapor well installations required by this letter.

For the convenience of providing further discussion in this letter, NMED has divided the vadose zone into five principal areas: the tank farm, pipeline, Fuel Offloading Rack, fuel percolation area, and the far field area of the soil-vapor plume. Each of these areas is discussed below.

1. Tank Farm – Contamination is known to occur from the surface to deep levels at the Tank Farm. In its letter of April 2, 2010, NMED directed that nine deep soil borings/soil-vapor wells be completed in the tank farm area; the Permittee proposed only three. Through its direction in it April 2, 2010 letter, NMED was hoping to avoid the time-consuming process of "dickering" with the Permittee on numbers of borings (and wells, to be discussed later). Nevertheless, in the interest of comity and upon further consideration, NMED agrees that by adjusting locations and completing some shallow borings, the tank farm area could be covered at least initially by five deep soil borings/soil-vapor wells and five shallow soil borings. Depending on what is found,

additional soil borings/soil-vapor wells may be needed, and NMED reserves its rights to require such additional borings, wells, or both in the future.

The Permittee shall complete the soil borings/soil-vapor wells at locations #16, 17, 19 and 20; and the soil vapor well at location #6 that are listed in Tables 1 and 2 of this letter, respectively, and shown on Figure 1 enclosed with this letter. The Permittee shall also complete shallow soil borings to a depth of at least 20 feet at locations #1 through 5, which are listed in Table 3 of this letter and shown also on Figure 1. Soil samples from the 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.

2. *Pipeline* – The Permittee has not investigated the pipeline that runs between the tank farm, the pump house, and the Fuel Offloading Rack. In NMED's letter of April 2, 2010, the Permittee was directed to complete four deep soil borings/soil-vapor wells along the buried and exposed portions of the pipeline. The Permittee proposed none.

In lieu of completing deep soil borings/soil-vapor wells, the Permittee proposed to complete shallow borings along the buried portion of the pipeline extending south of the pump house. However, the Vadose Zone Work Plan is unclear as to the number of shallow boreholes that would be completed. Additionally, the proposed plan is inadequate because the entire length of pipeline between the tank farm and the Fuel Offloading Rack is not included in the investigation.

The Permittee shall complete the deep soil borings/soil-vapor wells at locations #4, 6, 7, 8, and 24 that are listed in Table 1 of this letter and shown on Figure 1. The Permittee shall also complete shallow borings along the entire length of the pipeline between the tank farm and the Fuel Offloading Rack, regardless of whether the pipeline runs underground or on the surface. The borings shall be spaced at intervals not to exceed 25 feet and are to be located on both sides of the pipeline. Soil samples from the shallow borings shall be collected at depths of 0, 5, 10, 15, and 20 feet. The soil samples from deep and shallow borings shall be analyzed for TPH, VOCs, SVOCs, and lead. Depending on the results, NMED may require further investigation of this area, including more and deeper borings.

3. *Fuel Offloading Rack* – The Fuel Offloading Rack is supposedly the main source of the fuel spill, but it has not been adequately characterized since discovery of the fuel leak 10 years ago. Previous investigative efforts appear to have been arbitrarily terminated once TPH concentrations were found to be less than 100 mg/kg in soil and below 100 ppmv in soil vapor. In NMED's letter of April 2, 2010, the Permittee was directed to complete a ***minimum*** of six deep soil sampling/vapor wells at the Fuel Offloading Rack to determine the full extent of contamination; the Permittee proposed four. NMED reaffirms its previous direction. The Permittee shall complete the soil borings/soil-vapor wells at locations #1, 2, 3, 4, 11, and 12 that are listed in Table 1 of this letter and shown in Figure 1.

4. *Fuel percolation area* – This area, east of the Fuel Offloading Rack, is currently believed to constitute the core of the contamination in the vadose zone, and represents the place where fuel presumably migrated to groundwater. In NMED's letter of April 2, 2010, the Permittee was

directed to complete a ***minimum*** of six deep soil sampling/vapor wells in order to significantly improve characterization of this area. This is critical to understanding the amount of fuel contamination in the vadose zone that must be remediated. The Permittee proposed to complete only two of the deep soil sampling/vapor wells that the NMED specified.

The Permittee did, however, propose an additional 3 deep soil sampling/vapor wells at locations further to the east. NMED agrees that these latter locations are necessary to properly characterize this area. Thus, to improve the understanding of the amount of fuel contamination in the vadose zone that must be remediated, the Permittee shall complete the soil borings/soil-vapor wells at locations #5, 9, 10, 21, 22, 23, 25, 26, and 27 listed in Table 1 and shown on Figure 1.

5. Far field area of Soil-Vapor plume – In its letter of April 2, 2010, NMED directed the Permittee to install six soil-vapor wells at locations north of the Fuel Offloading Rack and fuel percolation area to investigate the concentrations of hazardous constituents in soil gas that overlies groundwater in these areas. The Permittee shall complete the soil-vapor wells at locations #1, 2, 4, 3, 5, 6, 8, and 9; and the soil boring/soil-vapor well at location #24, that are listed in Tables 2 and 1, respectively, and shown on Figure 1.

6. Sampling Requirements Applicable to all Five Vadose Zone Areas - 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. Each deep boring at each location shall be drilled from the surface to the water table, and each deep boring shall be completed as a permanent soil-gas monitoring well. 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.

All boreholes that will have soil-vapor monitoring wells constructed in them shall be logged using induction (medium and deep), neutron, and gamma tools. Geologic logs shall also be prepared for these boreholes showing the geologic conditions from the surface to the total depth of each borehole.

The coordinates in Tables 1-3 are State Plane Coordinates in feet, NAD83. All boring/soil vapor well locations are also shown on Figure 1 enclosed with this letter.

Table 1. Borehole Locations for Soil Sampling and for Conversion to Soil-Vapor Monitoring Wells.

Location #	Easting	Northing	Characterization Purpose
1	1541119	1473793	Step out from Fuel Offloading Rack
2	1540808	1473503	Step out from Fuel Offloading Rack
3	1541123	1473310	Step out from Fuel Offloading Rack
4	1541425	1473313	Step out from Fuel Offloading Rack and piping

5	1541961	1473492	Fuel percolation area
6	1542002	1473057	Piping
7	1541794	1473061	Piping
8	1542370	1473058	Piping
9	1541898	1473276	Fuel percolation area
10	1541720	1473369	Fuel percolation area
11	1541776	1473740	Step out from Fuel Offloading Rack
12	1541658	1473505	Fuel percolation area and Fuel Offloading Rack
16	1541992	1472768	Fuel tanks
17	1542229	1472916	Fuel tanks
19	1542485	1472911	Fuel tanks
20	1542428	1472716	Fuel tanks
21	1541611	1473238	Fuel percolation area
22	1542137	1473266	Fuel percolation area
23	1542131	1473571	Fuel percolation area
24	1541620	1472955	Far Field and piping
25	1542807	1473592	Fuel percolation area
26	1542422	1473506	Fuel percolation area
27	1542360	1473808	Fuel percolation area

Table 2. Locations for Soil-Gas Monitoring Wells.

Location #	Easting	Northing	Characterization Purpose
1	1542900	1474092	Far Field
2	1543194	1474680	Far Field
3	1542306	1474093	Far Field
4	1541555	1475049	Far Field
5	1541248	1474141	Far Field
6	1542259	1472591	Far Field and fuel tanks
8	1542504	1475414	Far Field
9	1542436	1474878	Far Field

Table 3. Locations for Shallow Soil Borings in Tank Farm Area.

Location #	Easting	Northing
1	1542544	1472810
2	1542282	1472806
3	1542125	1472784
4	1542081	1472959
5	1541941	1472867

The Permittee shall revise the Vadose Zone Work Plan to incorporate the general comments and correct the deficiencies noted above.

2. Specific Comments on Vadose Zone Work Plan

1. Downhole Geophysical Logging - Section 3.2.1.1, Table 3-1, Topic 3, states "If proposed vapor monitoring points are screened in zones determined to be fine grained lithologic units adjust the screen location vapor monitoring points up or down to the nearest coarser grained unit."

Because individual fine grained or coarse grained beds do not necessarily extend laterally for any significant distances, any geophysical logs used to adjust screen locations must be generated for that particular borehole.

The Permittee must revise the Vadose Zone Work Plan to indicate the maximum distance that screened zones are to be adjusted from the required screen depths should adjustment be necessary. For screens that are to be set 100 feet apart as directed under this letter, the Permittee may adjust screens by no more than 25 feet. For screens that are to be set 25 feet apart, the Permittee may adjust screens by no more than 5 feet.
2. Seismic Refraction, Section 3.2.1.2 - NMED encourages the use of geophysical techniques; however, NMED is doubtful that seismic refraction will prove useful in this case. NMED is concerned that refraction will only detect shallow loose material near the surface, somewhat more dense subsurface material, and saturated material beginning at the water table. Although KAFB is free to conduct the refraction survey, the NMED will not allow such survey to delay completion of other work required for characterizing and cleaning up the Bulk Fuels Facility Spill.

If the Permittee proceeds with conducting the refraction survey, the following issues must be addressed in the revised work plan.

A. Explain why seismic refraction was chosen and not shallow reflection.

B. Explain how seismic refraction is expected to identify the difference between a fine-grained unit and a coarse-grained unit above the saturated zone at depths of 450-500 feet (see DQO step 5 for topic 1 on Table 3-1). Table 3-1, DQO step 6, topic 1 implies that refraction will be able to define a unit within 1-foot depth at a depth of 500 feet. These Data Quality Objectives cannot likely be achieved.

C. If the 1-foot depth is actually referring to the location of geophones, specify what the QC targets are for the seismic survey (for example, how close should the interpreted seismic interface be to the actual depth to water). Specify the site-specific conceptual model of the seismic layering. Indicate the expected thicknesses versus depth of units to be detected.

D. Explain what seismic source is planned to be used in this "noisy" environment that can carry an off-the-end shot for the 1500 foot line. Conceptually, specify how many shot points and what locations are planned per line.

E. Figure 3-1 shows 13 seismic lines that are all oriented in an east-west direction. Section 3.2.1.2 discusses orthogonal lines. Clarify how many lines are planned. Specify how the orthogonal lines will be placed, and show them on a corrected Figure 3-1. Explain why the proposed seismic lines are shown crossing buildings.

3. Resistivity, Section 3.2.1.3 – Like the refraction survey discussed in the proceeding comment, the NMED is doubtful that the IP/RES techniques will prove useful in this case. Although KAFB is free to conduct the resistivity survey, the NMED will not allow such a survey to delay completion of other work required for characterizing and cleaning up the Bulk Fuels Facility Spill.

If the Permittee proceeds with conducting the survey, the following issues must be addressed in the revised work plan.

A. As described in Section 3.2.1.3 of the plan, 56 stakes are proposed to be situated along 1,850 feet transects. This amounts to an electrode separation of about 30 feet, which would yield a shallowest apparent resistivity of the upper nominal 30 feet, with a value every 30 feet horizontally. Explain how the resistivity survey is expected to provide good results with all the surface interferences, cultural conditions, pipelines, surface topography changes, utilities, and other conditions known to be present at the site. Explain how close, for example, does the interpreted depth to groundwater need to be to meet the "Specify Limits on Decision Errors" concept on Table 3-1. Specify the QC procedures to be performed, such as calibrating to a known resistance and reciprocity tests.

B. Explain why the proposed resistivity lines are shown crossing buildings.

C. Indicate whether the geophysical parameters measured in the Sunbelt Geophysics report were taken into account in planning the resistivity investigation.

D. Specify what size transmitter is to be used to be able to measure the appropriate parameters with appropriate detail at large depths, and what electrode arrays are to be used.

E. Indicate if an analysis has been conducted modeling what MN, AB, and AB-MN spacings seem plausible based upon site-specific resistivities (estimated from resistivity or induction logs) and equipment specifications.

F. F. Indicate and explain the computer model by which the data are to be interpreted.

4. Page 3-5, Section 3.2.3 – Substitute semi-volatile organic compounds (SVOCs) for polycyclic aromatic hydrocarbons (PAHs) and add lead to the parameters to be analyzed for in soil. The Permittee must revise the Vadose Zone Work Plan accordingly.

5. Page 3-6, Section 3.2.3 – The first paragraph on this page says that soil samples containing LNAPL will not be sent to the laboratory for chemical analysis. All soil samples, including those containing LNAPL, must be sent to a laboratory and analyzed for TPH, VOCs, SVOCs, and lead. The Permittee must revise the Vadose Zone Work Plan accordingly.

6. Page 3-6, Section 3.2.4 – This section states that screens on soil-vapor monitoring wells will be set to "anticipated depths" of 25, 50, 150, 250, 350, and 450 feet. The Permittee must revise the Vadose Zone Work Plan to indicate the maximum distance that screened zones are to be adjusted from the required screen depths, should adjustment be necessary. For screens that are to be set 100 feet apart as directed under this letter, the Permittee may adjust screens by no more than 25 feet. For screens that are to be set 25 feet apart, the Permittee may adjust screens by no more than 5 feet. The Permittee must revise the Vadose Zone Work Plan accordingly.

7. Cross-section "A-A" - Cross-section A-A' location shown on Figures 2-2 through 2-5 does not correspond to Cross-Section A-A' shown in Figure 2-8. Supply the intended cross-section A-A' with data shown clearly and legibly, and with appropriate data.

D. Groundwater Investigation Work Plan

General Comments on Groundwater Investigation Work Plan

In NMED's letter of April 2, 2010, the Permittee was directed to submit a Groundwater Investigation Work Plan that describes the additional actions the Permittee will take to characterize the nature, horizontal and vertical extent, and the fate and rate of migration of the groundwater contamination. The Groundwater Investigation Work Plan was also to include construction details and the locations and depths of the groundwater monitoring wells to be installed, actions to characterize the geology and hydrogeology at and below the water table,

groundwater flow direction and velocity, field procedures, and the sampling and analysis of groundwater and related quality control. The Groundwater Investigation Work Plan was also to describe the means *(e.g.,* cross-sections, plan views) by which results would be reported after the investigation and include a schedule to complete the work.

The leading (northern) edge and the eastern and western margins of the dissolved-phase and LNAPL plumes are as yet undefined, and the nature and concentrations of contaminants in the core of each of the plumes are poorly characterized because existing wells are located too far apart (generally at distances greater than 500 feet), vertical characterization information is nonexistent, and water quality beneath the LNAPL plume has not been assessed. Additionally, the vertical extent of contaminated groundwater, key aspects of the hydrology of the groundwater (hydraulic conductivity, velocity), and the geology (horizontal and vertical characteristics) of the saturated zone are poorly defined or are unknown.

In general, the Groundwater Investigation Work Plan proposes too few wells, both in a vertical and horizontal sense, than is needed to adequately characterize the geology, hydrology, and the nature and extent of contamination over such a large area of groundwater contamination. As mentioned earlier, NMED was hoping to avoid the time-consuming process of "dickering" with the Permittee on numbers of borings and wells by providing clear and specific direction in its April 2, 2010 letter. Nevertheless, in the interest of comity and upon further consideration, NMED agrees that by adjusting locations some well locations directed in NMED's April 2, 2010 letter can be replaced with some proposed by the Permittee in the Groundwater Investigation Work Plan. NMED nonetheless directs an increase in the number of sampling points over that proposed by the Permittee, with the goal of achieving adequate site characterization more quickly to address the urgent matter of cleaning up the Bulk Fuels Facility Spill. Depending on what is found, additional wells may be needed, and NMED reserves its rights to require such additional borings, wells, or both in the future. The Permittee shall revise the Groundwater Investigation Work Plan to include all of the well installations required by this letter.

NMED has identified several other general deficiencies with the Groundwater Investigation Work Plan, which includes issues related to background water quality, vertical characterization, water quality beneath the LNPAL plume, rate of contaminant migration, cluster/nested wells, and characterization of plume cores and margins. These general deficiencies are discussed below.

1. Background Water Quality - Only two upgradient wells have been installed that potentially may yield groundwater samples that are free from contamination. Both of these wells were only recently completed; none is screened appreciably below the water table to provide vertical characterization of water quality, geology, and hydrologic conditions. The Permittee must complete the background cluster/nested wells at location #6 listed in Table 4 of this letter and shown on Figure 2 (enclosed).

2. Vertical Characterization – The plan identifies proposed wells that are to be screened at various depths below the water table as "B" and "C" wells, with the "C" wells the deepest screened well at a given cluster/nested well location. Due to urgency of this matter, the NMED

does not approve of "C" well installation being contingent on "B" well results. Given that the pumping of water supply wells is known to induce vertical gradients in groundwater, can cause significant components of vertical flow in the vicinity of such wells, and draws water preferentially from productive zones that may be deeper than the water table, vertical characterization of groundwater quality, hydrology, and geology is required for all well installations specified by this letter.

3. Water Quality Beneath the LNAPL Plume - Although the lack of water quality information was identified specifically by the NMED as a data gap, the Groundwater Investigation Work Plan states that groundwater at well locations within the boundaries of the LNAPL plume will not be sampled and analyzed. This is an unacceptable approach. Knowledge of water quality beneath the LNAPL plume is crucial to understand the full extent and magnitude of the groundwater contamination.

4. Rate of Contaminant Migration - Although a critical question to be answered, it was not clear in the Groundwater Investigation Work Plan if the Permittee has a plan to address the rate of migration of either the dissolved-phase or LNAPL contaminant plumes, and in particular, the time it would take for the dissolved-phase plume to reach surrounding well fields. The Permittee must clarify this point.

5. Cluster versus Nested Wells – The NMED has no objections to the use of nested wells instead of cluster wells, provided the nested wells are properly constructed. However, in this case the NMED will not accept wells that are constructed with 3-inch diameter casing and screens. Three-inch diameter casing and screens are inappropriate for constructing groundwater monitoring wells that will be installed to depths of 500 feet or more. The Permittee shall design wells to be constructed in cluster or nested configurations using casing and screen that are no smaller than 5 inches in diameter. The borehole surrounding the well casing for a nested or cluster well must be of sufficient diameter to allow for an adequate annular space between the borehole and well casing and screen. The annular space must be of sufficient size to allow for proper construction of filter packs and seals, and for the installation of grouting (see the groundwater monitoring well construction requirements set forth in Part 2 of this letter).

6. Characterization of Plume Cores – The dissolved-phase and LNAPL plumes extend off base to nearly 0.9 to 0.5 miles, respectively from the presumed source, yet a total of only eight wells currently exist off-base to characterize the cores of both plumes. Of these eight wells, this includes two wells where groundwater has not been sampled for water quality in the past and one well that was only very recently installed at Bullhead Park for which no water quality data has been submitted to the NMED.

In NMED's letter of April 2, 2010, the Permittee was directed to install groundwater monitoring wells at a ***minimum*** of eight additional locations to characterize the concentrations of contaminants, and the geologic and hydrologic conditions that exist off-base in the plume cores; instead, the Permittee proposed only four.

To achieve the objective of providing initial plume-core characterization, the Permittee shall install the groundwater monitoring wells at locations #11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, and 23 listed in Table 4 and shown on Figure 2.

7. Characterization of Plume Margins – Only five existing wells define the edge of the plume off-base (including one well recently installed). In NMED's letter of April 2, 2010, the Permittee was directed to install groundwater monitoring wells at a ***minimum*** of eight additional locations to characterize the concentrations of contaminants, and the geologic and hydrologic conditions that exist off base along the plume margins; instead, the Permittee proposed five.

To adequately provide initial plume-edge characterization, the Permittee shall install the groundwater monitoring wells at locations #1, 2, 3, 4, 5, 7, 8, 9, 10, 24, 25, 26, 27, and 28 that are listed in Table 4 and shown on Figure 2.

Three groundwater monitoring wells shall be installed at different depths at each of the well locations listed in Table 4. The screen depths shown in Table 4 are distances (in feet) that the top of the screens shall be set below the water table, except wells screened across the water table (those with screen depths of zero in Table 4) may have screens that extend above the water table. 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.

The geologic conditions encountered from the surface to the total depth of the borings at each well location shall be logged. Boreholes completed for well installations at all locations shall also be logged using induction (medium and deep), neutron, and gamma (large crystal) tools. Geophysical and geologic logging at a given cluster well location is required only in the well at the location having the deepest screened interval.

Coordinates in Table 4 are State Plane Coordinates in feet, NAD83. All of the locations listed in Table 4 are also shown on Figure 2 enclosed with this letter.

Table 4. Well locations and screen depths relative to the water table.

Location #	Easting	Northing	Screen Depths	Characterization Purpose
1	1542189	1476725	0, 15, 40	Plume margin, deep characterization
2	1541984	1476042	0, 15, 40	Plume margin, deep characterization
3	1543703	1476600	0, 15, 40	Plume margin, deep characterization
4	1543372	1475065	0, 15, 40	Plume margin, deep characterization
5	1543643	1477939	0, 15, 85	Plume margin, deep characterization
6	1541430	1472370	15, 40*	Background water quality, deep characterization

7	1542812	1473601	0, 15, 40	Plume margin, deep characterization
8	1542722	1477726	0, 15, 40	Plume margin, deep characterization
9	1543054	1477788	0, 15, 40	Plume margin, deep characterization
10	1543774	1477304	0, 15, 40	Plume margin, deep characterization
11	1541774	1473718	0, 15, 85	Plume core, deep characterization
12	1542362	1473801	0, 15, 85	Plume core, deep characterization
13	1542305	1474340	15, 85*	Plume core, deep characterization
14	1542736	1474715	0, 15, 85	Plume core, deep characterization
15	1542860	1475860	0, 15, 85	Plume core, deep characterization
16	1542189	1475207	0, 15, 85	Plume core, deep characterization
17	1541731	1473291	0, 15, 85	Plume core, deep characterization
18	1542203	1474071	0, 15, 85	Plume core, deep characterization
19	1542565	1475360	0, 15, 85	Plume core, deep characterization
20	1542535	1475975	0, 15, 85	Plume core, deep characterization
21	1543199	1475767	0, 15, 85	Plume core, deep characterization
22	1543068	1476494	0, 15, 85	Plume core, deep characterization
23	1541968	1474648	0, 15, 85	Plume core, deep characterization
24	1541682	1474703	15, 40*	Plume margin, deep characterization
25	1541025	1474360	15, 40*	Plume margin, deep characterization
26	1540407	1474016	15, 40*	Plume margin, deep characterization
27	1543712	1475683	15, 40*	Plume margin, deep characterization
28	1543364	1477684	0, 15, 40	Plume margin, deep characterization

* - water table well already exists

The Permittee shall revise the Groundwater Investigation Work Plan to incorporate the general comments and correct the deficiencies noted above.

Specific Comments on Groundwater Investigation Work Plan

1. Page 3-6, Section 3.3.4 and Figure 3-3 – Well construction details are missing, as the wrong figure was submitted for a well construction diagram in the Work Plan. The Permittee shall revise the Groundwater Investigation Work Plan to correct the deficiency noted above.

2. *Page 3-4, Section 3.3.2* – This section states that "NMED will be notified regarding any deviations in well constructions per Section 4.0." Aside from the fact that there is no Section 4.0, well construction and any changes thereto must be approved in advance by the NMED. E-mail or telephone approval may suffice to facilitate in-field decision-making. The Permittee shall revise the Groundwater Investigation Work Plan accordingly.

3. *Page 3-5, Section 3.3.3* – Soil samples shall be collected at well locations #11, 12, 17, and 18 listed in Table 4 from the deepest borehole at each location. The samples shall be collected at a frequency of at least one sample every 10 feet for the first 50 feet of the borehole, then at least one sample every 50 feet to the bottom of the borehole, and at total depth of the borehole. The soil samples must be analyzed in the laboratory for TPH, VOCs, SVOCs, and lead. The Permittee shall revise the Groundwater Investigation Work Plan accordingly.

4. *Page 3-7, Section 3.3.5* – This section indicates that wells screened below the water table will be considered by the Permittee to be "piezometers" (normally for measuring only hydraulic head). Groundwater samples must be collected from all wells, regardless if the wells are screened at the water table or deeper, and all samples must be analyzed for TPH and hazardous constituents. The Permittee shall revise the Groundwater Investigation Work Plan accordingly.

5. *Page 3-7, Section 3.3.5* – This section states that wells located within the area of the floating LNAPL will not be developed. All wells, including those within the LNAPL plume, shall be properly developed to provide representative water samples. The Permittee shall revise the Groundwater Investigation Work Plan accordingly.

6. *Page 3-7, Section 3.3.6* – This section states that groundwater at wells located within the area of the floating LNAPL will not be sampled. Groundwater in all wells will be sampled, including those within the LNAPL plume. The Permittee shall revise the Groundwater Investigation Work Plan accordingly.

7. *Page 3-7, Section 3.3.6* – For analysis of groundwater samples, add lead and substitute SVOCs for PAHs, and dissolved iron and dissolved manganese for iron and manganese, respectively. Samples must not be filtered, except for sample fractions for dissolved iron and dissolved manganese.

Add alkalinity and pH to the list of field parameters.

The Permittee shall revise the Groundwater Investigation Work Plan accordingly.

8. *Page 3-6, Section 3.3.4* - It is not clear how many wells are actually proposed because wells KAFB-10629, KAFB-10630, and KAFB-10638 are not listed on Table 3-2 of the Groundwater Investigation Work Plan. The Permittee must clarify or resolve this discrepancy in a revision to the Groundwater Investigation Work Plan.

9. *Page 3-1, Section 3.1.1* - Indicate what geophysical logs will be run and at what stage of the borehole/well installation process. The discussion should be included in Section 3.3 instead of Section 3.1.1. The Permittee shall revise the Groundwater Investigation Work Plan accordingly.

10. *Page 3-2, Section 3.3.1* - See specific Comments #2 and 3 for the Vadose Zone Work Plan regarding surface geophysical surveys.

PART 2

A. Direction to Conduct Interim Measures and Other Actions

In NMED's letter of April 2, 2010, the Permittee was informed that the NMED has determined that the Bulk Fuel Facility Spill poses a threat to human health and the environment, and furthermore, endangers the groundwater resource – including water supply wells – relied upon by the WUA for delivery of safe drinking water to its customers. The contamination also threatens KAFB and the Veterans Administration ("VA") Hospital water-supply wells. The large extent of this contamination and its proximity to water supply wells requires that urgent action be taken.

The NMED has estimated that nearly 8 million gallons of fuel have been released at the Bulk Fuels Facility. The Permittee is operating four SVE units on the Permittee's property; however, these soil-vapor extraction units will not clean up the contamination thus far known to occur from the Bulk Fuels Facility Spill in a reasonable time frame. Because the Permittee's Interim Measures Work Plan does not contain any interim measures that could be implemented immediately, the NMED herein is directing the Permittee to:

1. conduct additional soil vapor extraction,
2. improve the Operation and Maintenance Plan for the SVE units,
3. begin immediate excavation of contaminated soil at the Fuel Offloading Rack,
4. provide an estimate of the contaminant migration rate,
5. install sentry wells,
6. log existing wells, including using geophysical methods,
7. submit critical data to the NMED, and
8. provide adequate funding to the WUA for sampling and analysis of well water.

SVE and these other actions must be initiated or completed, as appropriate, by the deadlines indicated in this letter and in the Compliance Schedule in Table 5. Additionally, this letter specifies minimum requirements that the Permittee must meet regarding well installations, well development, sampling, geophysical logging, preparing geologic logs, notification of activities, field and laboratory quality control, and reporting.

1. Soil Vapor Extraction

a. The Permittee has demonstrated that SVE has worked to remove contaminate vapors from the vadose zone. The Permittee shall install and operate additional SVE units at the following locations:

i. No later than **October 6, 2010** (Table 5) at existing groundwater monitoring wells KAFB-3411, KAFB-10614, and KAFB-10624, which are located in the core of the vadose zone contamination.
ii. No later than **November 8, 2010** (Table 5) at soil boring/soil-vapor monitoring well locations #4, 5, 9, 10, 11, 12, and 21 that are listed in Table 1 of this letter. These wells, to be located in the core of contamination, should be designed to serve both as vapor extraction wells and as soil-vapor monitoring wells. The Permittee must also conduct geologic logging and borehole geophysical logging at each location. The Permittee shall comply with the collection and analysis of soil samples as specified in Part 1 of this letter for well installations.
iii. No later than **October 6, 2010** (Table 5) or 60 days after required access is granted, which ever is later, at existing groundwater monitoring wells KAFB-10617 and 10618 which are located at the northern extent of the LNAPL plume.
iv. No later than **November 8, 2010** (Table 5) or 60 days after required access is granted, which ever is later, at existing groundwater monitoring wells KAFB-10610 which is located at the northern extent of the 1-foot thick layer of LNAPL plume.
v. No later than **November 8, 2010** (Table 5) or 60 days after required access is granted, which ever is later, locations #3, 8 and 9 on Table 2 of this letter shall be made ready for conducting future soil vapor extraction by completing soil-vapor monitoring/extraction wells at this location. The Permittee must conduct geologic logging and borehole geophysical logging at this location and shall comply with the collection and analysis of soil samples as specified in Part 1 of this letter for well installations.

b. The Permittee shall continue to operate SVE units at the locations of the four existing SVE units (located at the Fuel Offloading Rack, KAFB-1065, KAFB-1066, and KAFB-1068).

Until such time that the interim measures plan is approved by the NMED, the Permittee shall continue to operate all SVE units 24 hours per day, 7 days a week, except when necessary to perform maintenance or repairs. If maintenance or repairs are necessary, the maintenance or repairs shall be completed as quickly as practicable, and the unit returned to service immediately after maintenance or repairs are completed. Any maintenance or repairs that will take more than 3 calendar days shall be reported in writing to the NMED within 24 hours of discovery that the maintenance or repairs will take more than 3 days. The Permittee shall explain in the report why the maintenance or repairs will take more than 3 calendar days and why the delay is beyond the control of the Permittee.

The SVE units shall be similar to those currently in use for the Bulk Fuels Facility Spill and shall be capable of extracting soil vapor at a minimum flow rate of 27 SCFM. The SVE units shall also average over a period of 12 months an operating efficiency (operating time relative to down time) of no less than 85%. The SVE units shall meet the regulatory requirements for air emissions enforced by the City of Albuquerque Environmental Health Department. The Permittee is responsible for obtaining all necessary permissions and permits to construct and operate the SVE units.

If the City of Albuquerque Environmental Health Department will not issue an air permit to operate the SVE units specified by this letter, the Permittee shall immediately notify the NMED in writing and shall substitute a different technology for conducting SVE and treating emissions that will meet the regulatory requirements enforced by the City of Albuquerque Environmental Health Department and the deadlines set forth in this letter in the Compliance Schedule shown in Table 5.

2. Operation and Maintenance (O&M) Plan

The Permittee shall modify its O&M Plan to reduce down time of SVE units by maintaining in inventory commonly-needed spare parts for maintenance and repairs, and keeping a spare engine available for SVE units that suffer catastrophic engine failures. The spare parts and engine shall be maintained by the Permittee in inventory by **September 7, 2010**. The Permittee shall provide NMED with a written list of the spare parts and spare engine kept in inventory by **October 6, 2010** (Table 5).

3. Excavation of Soil and Removal of Fuel Offloading Rack

The Permittee shall by **October 6, 2010** (Table 5) begin removal of the remaining components of the Fuel Offloading Rack and excavation of contaminated soil to 20 feet. The excavation of soil and removal of the Fuel Offloading Rack shall be completed by **October 6, 2011** (Table 5), and a report on completion of the work submitted to the NMED by **January 15, 2012** (Table 5). Any soil contamination left in place must meet NMED's requirements for clean up (see Comment # 8 of Section A of Part 1 of this letter). The Permittee may use direct push sampling and field analysis to help determine which soils require excavation. However, laboratory analysis shall be conducted to determine the concentrations of hazardous constituents in soil for the purpose of defining the final extent of excavation, for risk assessment, and for waste determinations.

Soil shall be sampled to determine whether all contaminated soil that poses an unacceptable risk to human health or the environment has been removed to a depth of at least 20 feet. Soil samples shall be analyzed in the laboratory for TPH, VOCs, SVOCs, and lead, and collected on all sides and the bottom of the excavation at a spacing not to exceed 25 feet.

4. Estimates of Contaminant Migration Rate

The Permittee must provide NMED by **September 7, 2010** (Table 5) with calculations showing the estimated velocity of and the travel time for the dissolved-phase contaminant plume to first reach the closest well in the Ridgecrest well field, the Veteran Administration (VA) Hospital Well, and KAFB production wells KAFB-3, KAFB-15, and KAFB-16. The calculations shall consider the direction and gradient of groundwater flow, and the geologic and hydrologic properties of the aquifer under a worse-case scenario. The Permittee shall provide the source of all information used to support the required calculations.

5. Installation of Sentry Wells

a. The Permittee must install groundwater monitoring wells (water table, intermediate, and deep wells referred to as A, B, and C wells) at location #28 of Table 4 of this letter, north of the leading edge of the dissolved-phase contaminant plume, by no later than **November 8, 2010** (Table 5) or 90 days after required access is granted, which ever is later. These wells will serve as sentry wells for the northern extent of the dissolved-phase plume.
b. The Permittee must install B and C groundwater monitoring wells at existing well locations KAFB-10613 and KAFB-1064, near the V.A. Hospital, by no later than **November 8, 2010** (Table 5) or 90 days after required access is granted, which ever is later. These wells will serve as sentry wells for the V.A. Hospital.
c. The Permittee must install A, B, and C groundwater monitoring wells at location #3 listed in Table 4 of this letter, on the east edge of the dissolved-phase contaminant plume, by no later than **November 8, 2010** (Table 5) or 90 days after required access is granted, which ever is later. These wells will serve as sentry wells for the northeastern extent of the dissolved-phase plume.
d. The Permittee must install A, B, and C groundwater monitoring wells at location #1 listed in Table 4 of this letter, on the west edge of the dissolved-phase contaminant plume no later than **November 8, 2010** (Table 5) or 90 days after required access is granted, which ever is later. These wells will serve as sentry wells for the northwestern extent of the dissolved-phase plume.
e. The Permittee must also conduct geologic and borehole geophysical logging of each well discussed in paragraphs a-d of this section. Geologic logging must be completed during the drilling of the boreholes; geophysical logging must be completed within 30 days of well completion (Table 5). Copies of the geologic and geophysical logs must be provided to the NMED by the submittal dates for quarterly reports specified in NMED's letter of June 4, 2010.

Wells constructed in cluster or nested configuration must meet the requirements set forth in Comment # 5 of Section D of Part 1 of this letter. Groundwater samples shall be collected and analyzed in a laboratory at a quarterly frequency from each sentry well in accordance with the direction in NMED's letter of June 4, 2010, and directions under this letter.

6. Geophysical logging of Existing Wells

The Permittee must conduct borehole geophysical logging (medium and deep induction, gamma, and neutron) at all existing groundwater monitoring wells. Copies of the geophysical logs must be provided to the NMED by **October 6, 2010** (Table 5).

7. Submitting Critical Data to NMED

The Permittee failed to provide certain critical information required in NMED's April 2, 2010 letter. The Permittee must provide the following information to the NMED by **September 7, 2010** (Table 5):

i. tables in electronic format (Excel™) showing the locations (x, y, z), sampling points, and maximum depths of all soil borings and vapor and groundwater monitoring wells;
ii. Survey plats for all wells.
iii. tabulated data in electronic format (Excel™) and graphs showing hydrocarbons (HC) and trends of major hazardous constituent (such as benzene, toluene, ethylene dibromide, xylenes, naphthalene, ethylbenzene, and lead) concentrations versus time for soil vapor for each extraction and each soil-vapor and groundwater monitoring well, as applicable.
iv. tabulated data in electronic format (Excel™) and graphs showing trends of TPH and major hazardous constituent (such as benzene, toluene, ethylene dibromide, xylenes, naphthalene, ethylbenzene, and lead) concentrations versus time for groundwater for each groundwater monitoring well.
v. Cross-sections showing the geology of the site drawn to a horizontal scale of 1 inch equals 50 feet, a vertical scale of 1 inch = 50 feet, and along the orientations A-A', B-B', C-C', and D-D' as shown on Figure 3 enclosed with this letter.
vi. Cross-sections showing the geology of the site drawn to a horizontal scale of 1 inch equals 300 feet, a vertical scale of 1 inch = 50 feet, and along the orientations A-A', B-B', C-C', and D-D' as shown on Figure 4 enclosed with this letter.
vii. Cross-sections showing concentrations of major hazardous constituents in soil, drawn to a horizontal scale of 1 inch equals 50 feet, a vertical scale of 1 inch = 50 feet, and along the orientations A-A', B-B', C-C', and D-D' as shown on Figure 3 enclosed with this letter.
viii. Cross-sections showing concentrations of major hazardous constituents in soil vapor, drawn to a horizontal scale of 1 inch equals 50 feet, a vertical scale of 1 inch = 50 feet, and along the orientations A-A', B-B', C-C', and D-D' as shown on Figure 3 enclosed with this letter.
ix. Cross-sections showing concentrations of major hazardous constituents in groundwater, drawn to a horizontal scale of 1 inch equals 300 feet, a vertical scale of 1 inch = 50 feet, and along the orientations A-A', B-B', C-C', and D-D' as shown on Figure 4 enclosed with this letter.

8. Sampling and Analysis of Water Production Wells

NMED understands that the Permittee is providing funding to the WUA to analyze groundwater samples from WUA water-supply wells threatened by contamination originating from the Bulk Fuels Facility Spill. NMED has also become aware that the analytical method used by the WUA to test for ethylene dibromide (EDB) is 524.2 rather than Method 504.1, the latter which is normally used for purposes of determining compliance with Safe Drinking Water Act.

NMED does not consider analysis by Method 524.2 to be sufficiently sensitive to provide adequate early-warning protection for the WUA wells. The Permittee shall continue to collaborate with the WUA to ensure that water quality is safe for human consumption, but will also ensure the samples are analyzed by Method 504.1. The Permittee shall provide copies of the laboratory results to the NMED in quarterly reports in accordance with the reporting requirements of NMED's letter of June 4, 2010.

B. Technical Requirements for Conducting Interim Measures

1. Notification of Sampling and other Field Activities

The Permittee shall notify the NMED in writing of field sampling or other field activities undertaken in accordance with the requirements of this letter, and shall provide the NMED the opportunity to collect split samples upon request by the NMED. For such sampling or other field activities, the Permittee shall provide the NMED with as much advance notice as is practicable, but no less than 15 days prior to the conduct of such sampling. The Permittee shall notify the NMED in writing a minimum of 15 days prior to the implementation of the Interim Measures, Groundwater Investigation and Vadose Zone Work Plans. Notification of sampling or other field activities may be made by email, fax, or letter.

2. Soil-Vapor Well Construction

Soil-vapor monitoring wells shall be designed and constructed in a manner that will yield high-quality samples. Soil vapor wells shall not be installed with the use of any fluids. Soil vapor wells may be completed by backfilling with native materials. The Permittee shall not sample the well before the expiration of the 24-hour equilibration period following completion of installation. Information on the design and construction of soil-vapor monitoring wells shall be recorded as for groundwater monitoring wells.

3. Groundwater Monitoring Well Construction

Groundwater monitoring wells shall be designed and constructed in a manner that will yield high quality samples, ensure that the well will last the duration of the project, and ensure that the well will not serve as a conduit for hazardous constituents to migrate between different stratigraphic

units or aquifers. The design and construction of groundwater monitoring wells shall comply with the guidelines established in various RCRA guidance, including, but not limited to:

EPA, *RCRA Groundwater Monitoring Technical Enforcement Guidance Document*, OSWER-9950.1, September, 1986; and

Aller, L., Bennett, T.W., Hackett, G., Petty, R.J., Lehr, J.H., Sedoris, H., Nielsen, D.M., and Denne, J.E., *Handbook of Suggested Practices for the Design and Installation of Groundwater Monitoring Wells*, EPA 600/4-89/034, 1989.

1. Drilling Methods

The Permittee shall abide by the following conditions:

1. Drilling shall be performed in a manner that minimizes impacts to the natural properties of the subsurface materials;
2. Drilling shall be performed in a manner that contamination and cross-contamination of groundwater and aquifer materials is avoided;

1. The drilling method shall allow for the collection of representative samples of rock, unconsolidated sediment, and soil;
2. The drilling method shall allow the Permittee to determine when the appropriate location for the screened interval(s) has been encountered;
3. The drilling method shall allow for the proper placement of a filter pack and annular sealant for each monitored zone, and the borehole diameter shall be at least four inches larger in diameter than the nominal diameter of the well casing and screen to allow adequate space for emplacement of the filter pack and annular sealants;
4. The drilling method shall also allow for the collection of representative groundwater samples; and
5. Drilling fluids, including air, shall be used only when minimal impact to the surrounding formation and groundwater can be ensured.

All drilling equipment shall be in good working condition and capable of performing the planned tasks. Drilling rigs and equipment shall be operated by properly trained crews. Drilling equipment shall be properly decontaminated before initiation of drilling for each boring. Precautions shall be taken to prevent the migration of contaminants between geologic, hydrologic, or other identifiable zones during drilling and well installation activities.
The drilling and sampling shall be conducted under the direction of a qualified engineer or geologist. Known site features and/or site survey grid markers shall be used as references to locate each boring prior to surveying the location.

2. Well Construction Materials

When selecting construction materials, the primary concern shall be selecting well construction materials that will not contribute to or remove hazardous waste or constituents from groundwater

samples. Other factors to be considered include the tensile strength, compressive strength, and collapse strength of the materials; the length of time the monitoring well will be in service; and the material's resistance to chemical and microbiological corrosion.

3. Design and Construction of Screens and Filter Packs

Screens and filter packs shall be designed to allow accurate sampling of the saturated zone that the well is intended to sample, minimize the passage of formation materials (turbidity) into the well, and ensure sufficient structural integrity to prevent the collapse of the intake structure. The filter pack shall be installed in a manner that prevents bridging and particle-size segregation. Filter packs shall be installed by the tremie pipe method. At least two inches of filter pack material shall be installed between the screen and the borehole wall, and two feet of filter pack material shall extend above the top of the screen. A minimum of six inches and a maximum of two feet of filter pack material shall also be placed under the bottom of the screen. The precise volume of filter pack material required shall be calculated and recorded before placement, and the actual volume used shall be determined and recorded during construction. Any significant discrepancy between the calculated and actual volume shall be explained. Prior to installing the filter pack annular seal, a one to two-foot layer of chemically inert fine sand shall be placed over the filter pack to prevent the intrusion of annular sealants into the filter pack.

4. Design and Construction of Annular Seals

The annular space between the casing and the borehole wall shall be properly sealed to prevent cross-contamination. The materials used for annular sealants shall be chemically inert with respect to the highest anticipated concentration of chemical constituents expected in the groundwater. The precise volume of annular sealant required shall be calculated and recorded before placement, and the actual volume shall be determined and recorded during construction. Any significant discrepancy between the calculated volume and the actual volume shall be explained.

During construction, an annular seal shall be placed on top of the filter pack. This seal shall normally consist of a high solids (10 to 30 percent) bentonite material in the form of bentonite pellets, granular bentonite, or bentonite chips. The seal shall be placed in the annulus through a tremie pipe. A tamping device shall be used to ensure that the seal is emplaced at the proper depth. The bentonite seal shall be placed above the filter pack with a minimum of two-foot vertical thickness. The bentonite seal shall be allowed to completely hydrate in conformance with the manufacturer's specifications prior to installing the overlying annular grout seal. A grout seal shall be installed on top of the filter pack seal. The grout shall be placed into the annular space by the tremie pipe method, from the top of the filter pack annular seal to within a few feet of the ground surface; however, the grout shall be installed at intervals necessary to allow it time to cure and not damage the filter pack or filter pack annular seal during installation of the grout. The grout seal shall be allowed to cure for a minimum of 24 hours before the concrete surface pad is installed. All grouts shall be prepared in accordance with the manufacturer's specifications.

5. Surface Completion Methods

Monitoring wells may be completed either as flush-mounted wells, or as above-ground completions. A surface seal shall be installed over the grout seal and extended vertically up the well annulus to the land surface. The lower end of the surface seal shall extend a minimum of one foot below the frost line to prevent damage from frost heaving. The composition of the surface seal shall be neat cement or concrete. In above-ground completions wherein the well casing rises or sticks up above ground level, a three-foot square by four-inch thick concrete surface pad shall be installed around the well immediately after the protective casing is installed. The surface pad shall be sloped so that drainage will be off the pad and away from the protective casing. In addition, a minimum of one inch of the finished pad shall be below grade or ground elevation to prevent washing and undermining by soil erosion.

Protective casing with a locking cover shall be installed around the well casing (stickup or riser) to prevent damage or unauthorized entry. The protective casing shall be anchored in the concrete surface pad below the frost line and extend at least several inches above the casing stickup. A weep hole shall be drilled into the protective casing just above the top of the concrete surface pad to prevent water from accumulating and freezing inside the protective casing. A cap shall be placed on the well riser to prevent the entry of foreign materials into the well, and a lock shall be installed on the cover of the protective casing to provide security against tampering. If a well is located in an area that receives vehicular traffic, a minimum of three bumper guards consisting of steel pipes three to four inches in diameter and a minimum of five-feet in length shall be installed next to the concrete surface pad. The bumper guards shall be installed to a minimum depth of two feet below the ground surface in a concrete footing and extend a minimum of three feet above ground surface. The pipes that form the bumper guards shall be filled with concrete to provide additional strength, and shall be painted a bright color to make them readily visible.
If flush-mounted completions are required (e.g., in active roadway areas), a protective structure such as a traffic-rated utility vault or meter box shall be installed around the casing. In addition, measures should be taken to prevent the accumulation of surface water in the protective structure and around the well intake. These measures shall include outfitting the protective structure with a steel lid or manhole cover that has a rubber seal or gasket, and ensuring that the bond between the cement surface seal and the protective structure is watertight. A lock shall be installed on the lid or cover of the protective structure to prevent unauthorized access to the well.

6. Well Development Methods

All monitoring wells shall be developed to create an effective filter pack around the screen, correct damage to the formation caused by drilling, remove residual drilling mud or other drilling additives, if present, and fine particles from the formation near the borehole, and assist in restoring the original water quality of the aquifer in the vicinity of the well. Monitoring wells shall be developed until the column of water in each well is free of visible sediment, and the pH, temperature, turbidity, and specific conductance have stabilized to within 10%. If a well is pumped dry, the water level shall be allowed to sufficiently recover before the next development period is initiated.

If water is introduced to a borehole during drilling and completion, then at minimum the same volume of water shall be removed from the well during development. In addition, the volume of water withdrawn from or introduced into a well during development shall be recorded. Well development must be completed within 30 days of installation.

4. Surveying Requirements for Groundwater Monitoring and Soil-Vapor Wells

The horizontal and vertical coordinates of the measuring point at the top of each monitoring well casing and the ground surface elevation at each monitoring well location shall be determined by a registered New Mexico professional land surveyor or licensed Professional Engineer. Horizontal coordinates shall be measured in accordance with the State Plane Coordinate System. Horizontal positions shall be measured to the nearest 0.1 foot, and vertical elevations shall be measured to the nearest 0.01 foot.

5. Well Completion Reports

For each monitoring well, the Permittee shall submit to the NMED a completion summary report which shall include a well construction log and diagram, a geologic log, and a well development log. The report for each well shall be submitted in accordance with the quarterly schedule set forth in NMED's letter of June 4, 2010.

6. Well Construction Diagrams and Logs

Information on the design, construction, and development of each monitoring well shall be recorded. Construction diagrams and logs shall include the following information:

1. Well, boring name/number;
2. Date/time of construction;
3. Borehole diameter and casing diameter;
4. Surveyed location coordinates;
5. Total depth, expressed both as depth below ground surface and elevation above sea level;
6. Name of drilling contractor;
7. Casing length;
8. Casing materials;
9. Casing and screen joint type;
10. Screened intervals, expressed both as depth(s) below ground surface and elevation(s) above sea level;
11. Screen materials;
12. Screen slot size and design;
13. Filter-pack material and size;
14. Filter-pack volume (calculated and actual);
15. Filter-pack placement method;

16. Filter-pack interval(s), expressed both as depth(s) below ground surface and elevation(s) above sea level;
17. Annular sealant composition;
18. Annular sealant placement method;
19. Annular sealant volume (calculated and actual);
20. Annular sealant interval, expressed both as depth below ground surface and elevation above sea level;
21. Surface sealant composition;
22. Surface seal placement method;
23. Surface sealant volume (calculated and actual);
24. Surface sealant interval, expressed both as depth below ground surface and elevation above sea level;
25. Surface seal and well apron design and construction;
26. Development procedure and turbidity measurements;
27. Well development purge volume(s) and stabilization parameter measurements;
28. Type, design, and construction of protective casing;
29. Type of cap and lock;
30. Ground surface elevation above sea level;
31. Survey reference point elevation above sea level on well casing;
32. Top of casing elevation above sea level;
33. Top of protective steel casing elevation above sea level;
34. Drilling method(s); and
35. Types, quantities, and dates/times that additives were introduced, if any.

7. Measurement of Groundwater Levels

Groundwater levels shall be measured in all monitoring wells associated with the Bulk Fuels Facility Spill within 72 hours from the start of monitoring the water level in the first well. Groundwater levels shall be obtained prior to purging for any sampling event. Measurement data and the date and time of each measurement shall be recorded on a field log. The depth to groundwater shall be measured to the nearest 0.01 foot. The depth to groundwater shall be recorded relative to the surveyed well casing rim.

8. Sampling of Environmental Media

Sampling of environmental media (groundwater, soil, and soil vapor) shall comply with the requirements set forth in NMED's letter of June 4, 2010, and in accordance with the additional requirements provided herein.

1. Soil Sampling Requirements

Relatively undisturbed discrete soil and rock samples shall be obtained during the advancement of each boring for the purpose of logging and analytical testing. A split-barrel sampler lined with brass sleeves, a coring device, or other method approved in advance by the NMED shall be used to obtain samples during the drilling of each boring.

Soil samples are subject to the same field quality assurance, laboratory quality assurance, data validation, and reporting requirements as for groundwater and soil-vapor samples; including requirements to collect or prepare, as appropriate, and analyze field quality control samples. Soil samples collected for the purpose of analyzing for VOCs and SVOCs shall not be mixed to homogenize samples for any reason.

2. Groundwater Sample Collection

Groundwater samples shall be obtained within eight hours of the completion of well purging. Groundwater in monitoring wells with low recharge rates and that purge dry shall be sampled when the water level in the well has recovered sufficiently to collect the required samples. Sample collection methods shall be documented in field monitoring logs. Samples shall be placed into appropriate clean containers. Decontamination procedures shall be established and, implemented, for nondedicated water sampling equipment.

The Permittee shall obtain groundwater samples for dissolved metals analysis using disposable in-line filters with a 0.45 micron mesh size.

9. Field Quality Control

Field duplicates shall consist of two samples collected sequentially. Field duplicate samples shall be collected and analyzed at a frequency of at least 10 percent of the total number of environmental samples submitted for analysis. At a minimum, one duplicate sample per sampling event shall always be collected and analyzed.

Field blanks shall be prepared and analyzed at a frequency of no less than one per day. Field blanks shall be generated by filling sample containers in the field with deionized water and submitting the field blank, along with the groundwater samples, to an analytical laboratory.

Equipment blanks shall be prepared and analyzed at a rate of at least five percent of the total number of environmental samples submitted for analysis, but no less than one equipment blank per sampling day. Equipment blanks shall be generated by rinsing decontaminated sampling equipment with deionized water, and capturing the rinsate water in an appropriate clean container. The equipment blank then shall be submitted with the groundwater samples to the analytical laboratory for the same analyses as the environmental samples.

Trip blanks shall be prepared using deionized water. Trip blanks shall be managed exactly the same as environmental samples. Trip blanks shall accompany sampling personnel into the field

throughout sampling activities, and then shall be placed into a shipping container with environmental samples for shipment to the analytical laboratory. Trip blanks shall be analyzed at a frequency of one for each shipping container holding samples for VOC analysis.

10. Laboratory Quality Assurance

The Permittee shall ensure that contract analytical laboratories maintain internal quality assurance programs in accordance with EPA and industry-accepted practices and procedures. At a minimum, the laboratories shall use a combination of standards, blanks, surrogates, duplicates, matrix spike/matrix spike duplicates (MS/MSD), and other laboratory control samples to assess data quality. The laboratories shall establish control limits for individual chemicals or groups of chemicals based on the long-term performance of the test methods. In addition, the laboratories shall establish internal QA/QC procedures that meet EPA's laboratory certification requirements. Specific procedures to be completed are identified in the following sections. If a laboratory is unable or unwilling to meet the requirements of this Permit, the Permittee shall select a different laboratory that can and will meet the requirements.

1. Laboratory Equipment Calibration Procedures

The laboratories' equipment calibration procedures, calibration frequency, and calibration standards shall be in accordance with the EPA test method requirements and documented in quality assurance and standard operating procedures manuals. All instruments and equipment used by laboratories shall be operated, calibrated, and maintained according to manufacturers' guidelines and recommendations. Operation, calibration, and maintenance shall be performed by personnel who have been properly trained in these procedures. A routine schedule and record of instrument calibration and maintenance shall be kept on file at the laboratories.

2. Laboratory QC Samples

Analytical procedures shall be evaluated for quality by analyzing reagent blanks or method blanks, surrogates, MS/MSDs, and laboratory duplicates, as appropriate for each method. At a minimum, laboratories shall analyze laboratory blanks, MS/MSDs, and laboratory duplicates at a frequency of at least one in 20 for all batch runs requiring EPA test methods and at a frequency of at least one in 10 for non-EPA test methods. All laboratory quality control data reported with the Facility's sample analysis results must be related to the analysis of the Facility's samples.

11. Data Validation

The Permittee shall evaluate all sample data, and all field and laboratory QC results for acceptability. Each group of samples shall be evaluated using data validation guidelines contained in EPA guidance documents, the latest version of SW-846, and industry-accepted methods and procedures. Additionally, the Permittee shall evaluate all data for compliance with the following parameters:

1. Representativeness -- The Permittee shall implement procedures to assure representative samples are collected and analyzed, such as repeated measurements of the same parameter at the same location over several distinct sampling events. The Permittee shall note any procedures or variations that may affect the collection or analysis of representative samples and shall qualify the data accordingly;

2. Comparability -- To assure comparability of data, the Permittee shall implement standard collection and analytical procedures, and shall report analytical results in appropriate units for comparison with other data (e.g., past studies, comparable sites, screening levels, and cleanup standards). Any procedure or variation that may affect comparability shall be noted, and the data shall be qualified appropriately;

3. Completeness -- The Permittee shall evaluate all laboratory data for completeness with respect to data quality objectives. The degree of completeness shall be reported with the data in any reports in which the data are referenced;

4. Accuracy -- The Permittee shall evaluate all data for accuracy with respect to percent recovered of spiked samples. Results shall be reported for each analyte in any report in which the data are cited; and

5. Precision -- The Permittee shall evaluate all data for precision with respect to RPDs of duplicate samples. Results shall be reported for each analyte in any report in which the data are cited.

12. Waste Management

Waste management of investigation derived waste shall be in accordance with that set forth in Part 1 of this letter.

13. Geophysical Logs

Geophysical logging shall be conducted using induction (deep, medium), neutron, and gamma (large crystal) tools. Geophysical logging at cluster/nested well locations is required in only the well at each location that has the deepest screened interval.

Geophysical logs submitted to the NMED must show results of the induction logging (medium and deep) in millimhos per meter, neutron logging in American Petroleum Institute (API) neutron units, and gamma logging in API calibrated counts per second, the results of each method plotted versus depth from the surface to total depth of the borehole for which the log represents. The name of the borehole, location of the borehole, the date(s) that the borehole was completed, the drilling method, and the elevation of the top of the borehole shall also be noted on the boring log. The data must be provided to the NMED in hard copy and in digital format.

14. Field and Geologic Logs

The physical characteristics of soil and rock samples, such as mineralogy and lithic content, ASTM soil classification, moisture content, texture, color, presence of stains or odors, field screening results, depth, location, method of sample collection, the presence of any water-bearing zones and any unusual or notable conditions encountered during drilling shall be recorded in a field log. Field logs shall be completed by a qualified geologist.

The Permittee shall prepare geologic logs for each borehole showing relative to borehole depth the rock types, thickness of rock units, and water bearing zones (including that at and below the water table). The name of the borehole, location of the borehole, the date(s) that the borehole was completed, the drilling method, and the elevation of the top of the borehole shall also be noted on the boring log. The data must be provided to the NMED in hard copy and in digital format.

15. Reporting

Unless specified otherwise in this letter, the Permittee shall report to the NMED the information that is required by NMED's letter of June 4, 2010, and by the indicated schedules in that letter. Reporting for the additional SVE units required to be installed under Part 2 of this letter shall also be in accordance with NMED's letter of June 4, 2010.

Final Direction

The Permittee shall meet the deadlines specified in the Compliance Schedule of Table 5 of this letter. The Interim Measures, Groundwater Investigation, and Vadose Zone Work Plans must be completely revised and resubmitted. The Permittee shall submit to NMED by **September 7, 2010** (Table 5) revisions of the Vadose Zone, Interim Measures, and Groundwater Investigation Work Plans that correct the deficiencies 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 2 of this letter by the dates indicated and in accordance with the schedule in Table 5.

The investigation plans required under this letter shall 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 in a legible manner, and clearly showing which borings/wells contributed data towards construction of the maps and cross-sections and which did not. 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 shall also be included in the reports and plans. For soil-gas monitoring wells, tables and graphs shall also be included providing trends of TPH concentrations versus time for the depths below ground surface of 25, 50, 150, 250, 350, and 450 feet.

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 NMED in writing regarding its best efforts and its failure to obtain such access.

Table 5. Compliance Schedule.

Revisions to Work Plans	
Submittal	Due Date
Interim Measures Work Plan	September 7, 2010
Vadose Zone Work Plan	September 7, 2010
Groundwater Investigation Work Plan	September 7, 2010
Other Document Submittals	
Indoor Air Quality Report	October 6, 2010
Interim Measures and other Actions	
Install and operate SVE units at KAFB-3411, KAFB-10614, and KAFB-10624	October 6, 2010
Install and operate SVE units at soil boring/monitoring well locations #4, 5, 9, 10, 11, and 12 (see Table 1)	November 8, 2010 or 60 days after required access is granted, which ever is later
Install and operate SVE units at KAFB-10617 and KAFB-10618	October 6, 2010
Install and operate SVE units at soil boring/monitoring well location KAFB-10610	November 8, 2010 or 60 days after required access is granted, which ever is later
Prepare for SVE operation at soil boring/monitoring well locations #3, 8, and 9 (see Table 2)	November 8, 2010 or 60 days after required access is granted, which ever is later
Operate SVE units at Fuel Offloading Rack and KAFB-1065, KAFB-1066, and KAFB-1068	Immediately, except operation of SVE Unit at Fuel Offloading Rack may be temporarily suspended while excavating soil and removing remaining components of the Fuel Offloading Rack.
Maintain spare parts and spare engine for SVE units in inventory	September 7, 2010
Report that spare parts and spare engine for SVE units is in inventory	October 6, 2010
Begin excavation of contaminated soil and removing remaining components of the Fuel Offloading Rack.	October 6, 2010
Complete excavation of contaminated soil and	October 6, 2011

removing remaining components of the Fuel Offloading Rack.	
Report on completion of excavation of contaminated soil and removing remaining components of the Fuel Offloading Rack.	January 15, 2012
Submit estimate of contaminant migration rate to NMED	September 7, 2010
Complete A, B, and C sentry wells at location #28 (see Table 4)	November 8, 2010 or 90 days after required access is granted, which ever is later
Complete B and C sentry wells at KAFB-10613 and KAFB-1064	November 8, 2010 or 90 days after required access is granted, which ever is later
Complete A, B, and C sentry wells at location #3 (see Table 4)	November 8, 2010 or 90 days after required access is granted, which ever is later
Complete A, B, and C sentry wells at location #1 (see Table 4)	November 8, 2010 or 90 days after required access is granted, which ever is later
Complete geologic logs of new wells at locations #1, 3, 28, KAFB-10613 and KAFB-1064	During drilling of each well
Complete geophysical logs of new wells at locations #1, 3, 28, KAFB-10613 and KAFB-1064	Within 30 days of well completion
Submit copies of geologic and geophysical logs for locations #1, 3, 28, KAFB-10613 and KAFB-1064	In accordance with NMED letter of June 4, 2010
Submit copies of geophysical logs of existing wells	October 6, 2010
Submit critical data to NMED (Section A.7 of Part 2).	September 7, 2010
Notification of sampling and other field activities (Section B.1 of Part 2)	No less than 15 days prior to implementation
Submit geologic and geophysical logs for sentry wells	In accordance with NMED letter of June 4, 2010
Submit water quality data for WUA wells	In accordance with NMED letter of June 4, 2010
Submit well completion reports	In accordance with NMED letter of June 4, 2010
Submit report on all SVE units	In accordance with NMED letter of June 4, 2010
Report to NMED if any SVE units will not receive an air emissions permit to operate	Immediately
Report to NMED down time of SVE units that will exceed a duration of 72 hours	Within 24 hours of discovery that repairs or maintenance will take more than 72 hours to complete

The Permittee shall respond directly to my attention, with copy to Mr. Bill Olson of the NMED's 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.

If you have any questions regarding the technical aspects of this letter, please contact Mr. William Moats of my staff at (505) 222-9551. Any other questions should be directed to me at 505-476-6016.

Sincerely,

James P. Bearzi
Chief
Hazardous Waste Bureau

Enclosures: Figures 1-4

cc: J. Kieling, NMED HWB
W. Moats, NMED HWB
W. McDonald, NMED HWB
S. Brandwein, NMED HWB
B. Olsen, HWB GWQB
A. Puglisi, HWB GWQB
B. Swanson, HWB GWQB
L. Barnhart, NMED OGC
B. Gallegos, AEHD
B. Gastian, ABCWUA
L. King, EPA-Region 6 (6PD-N)
File: Reading and KAFB 2010

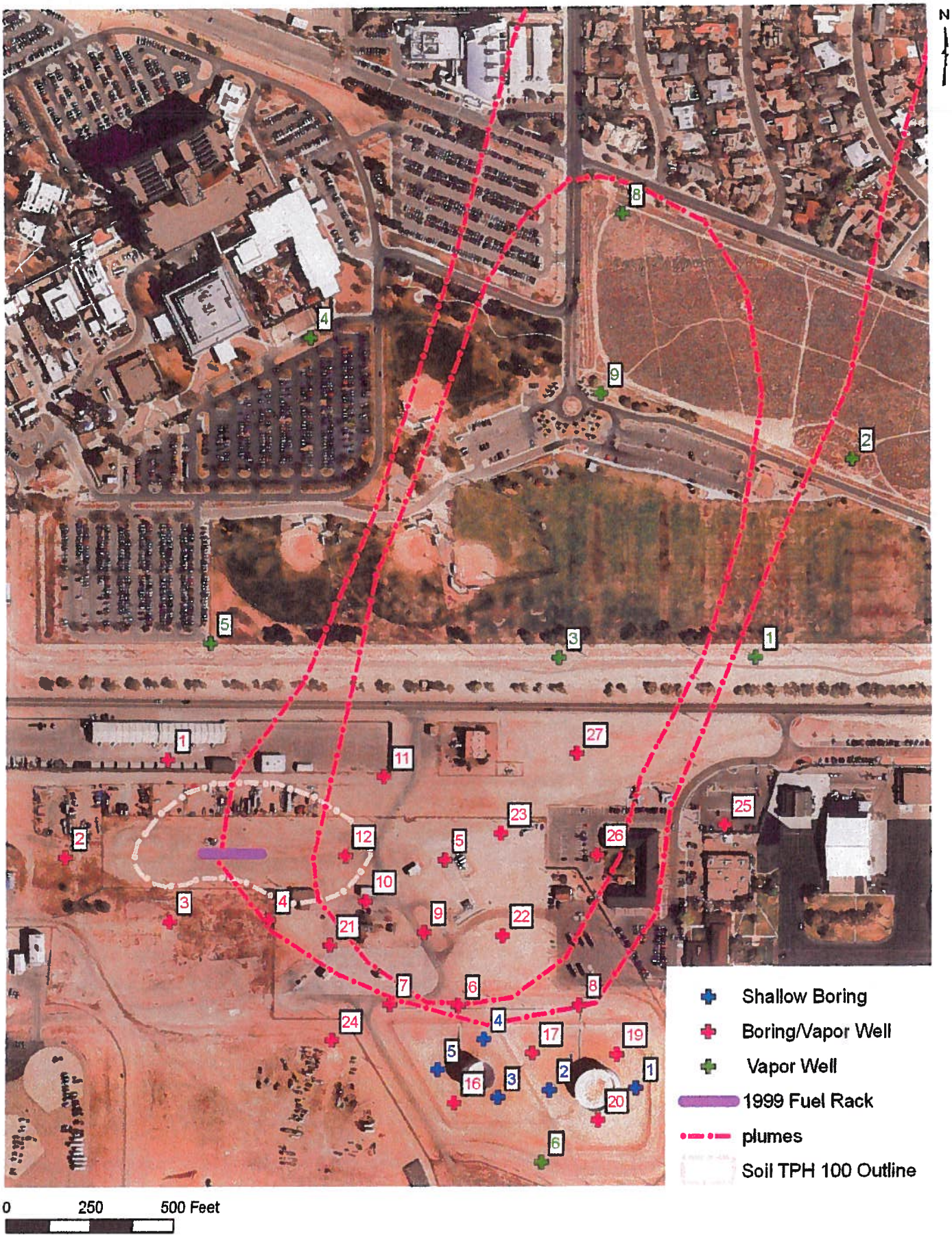

Figure 1. Soil Boring and
Soil-Vapor Monitoring Well Locations

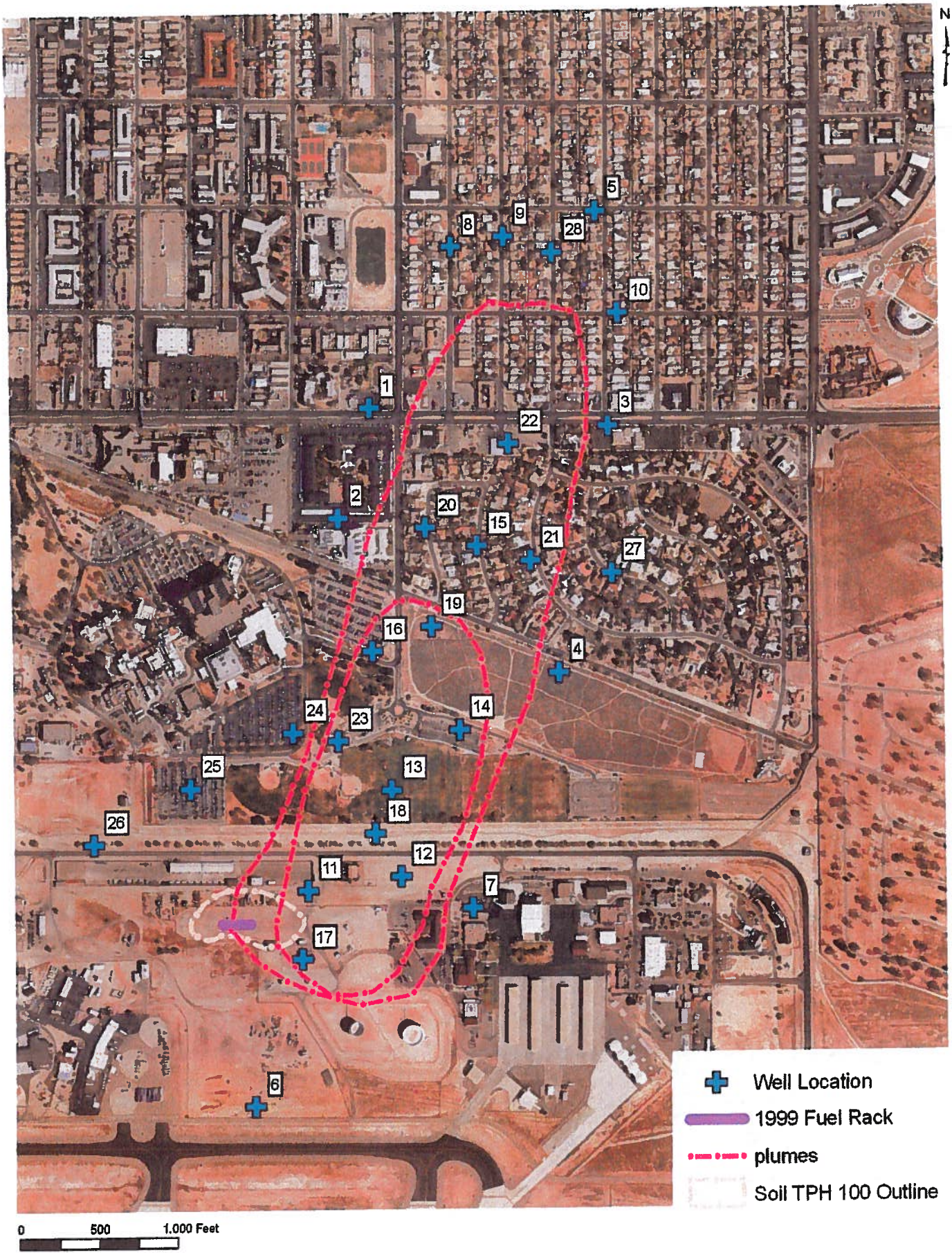

Figure 2. Groundwater Monitoring Well Locations

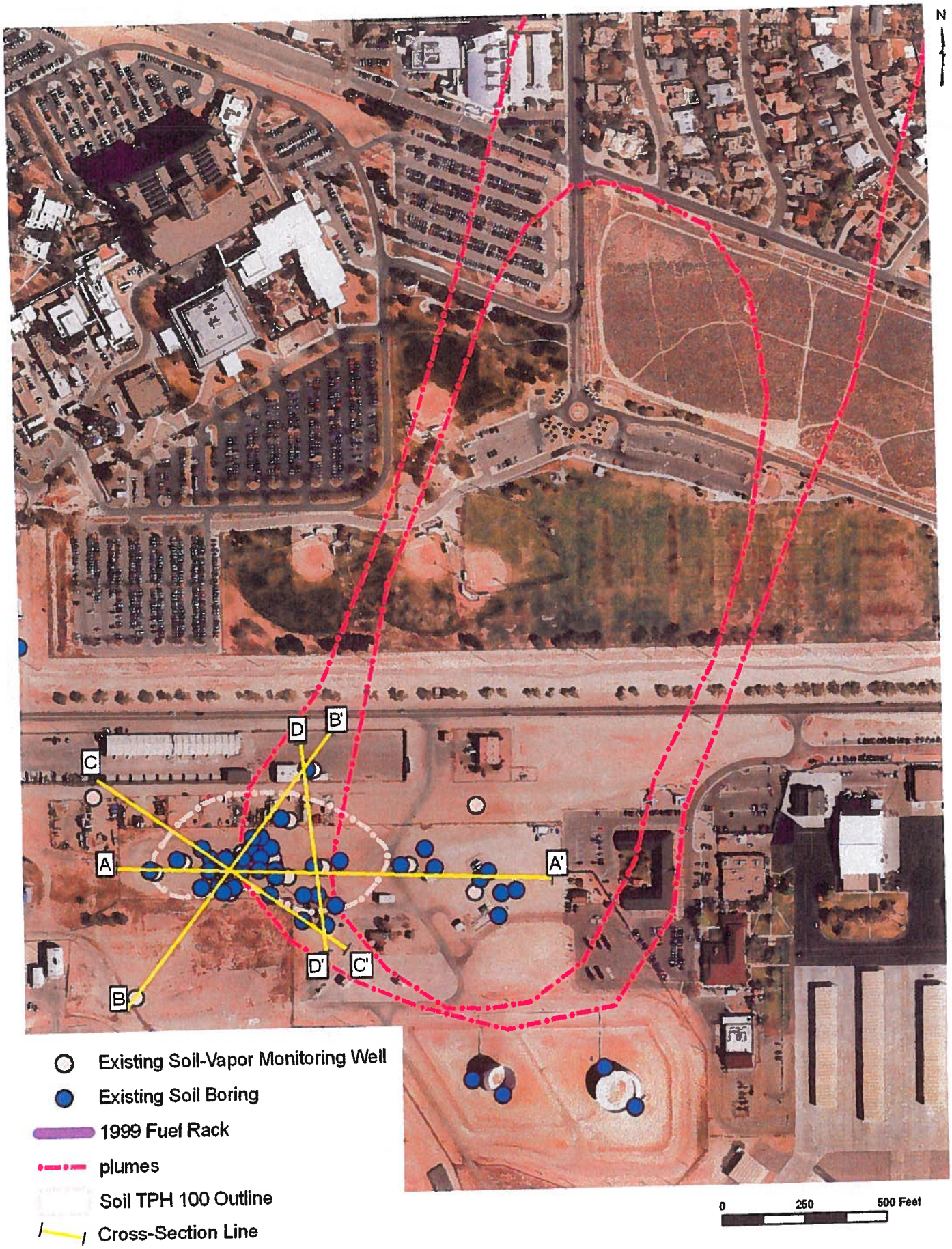

Figure 3 Existing Soil Boring, Soil-Vapor Monitoring Well and Cross-Section Locations

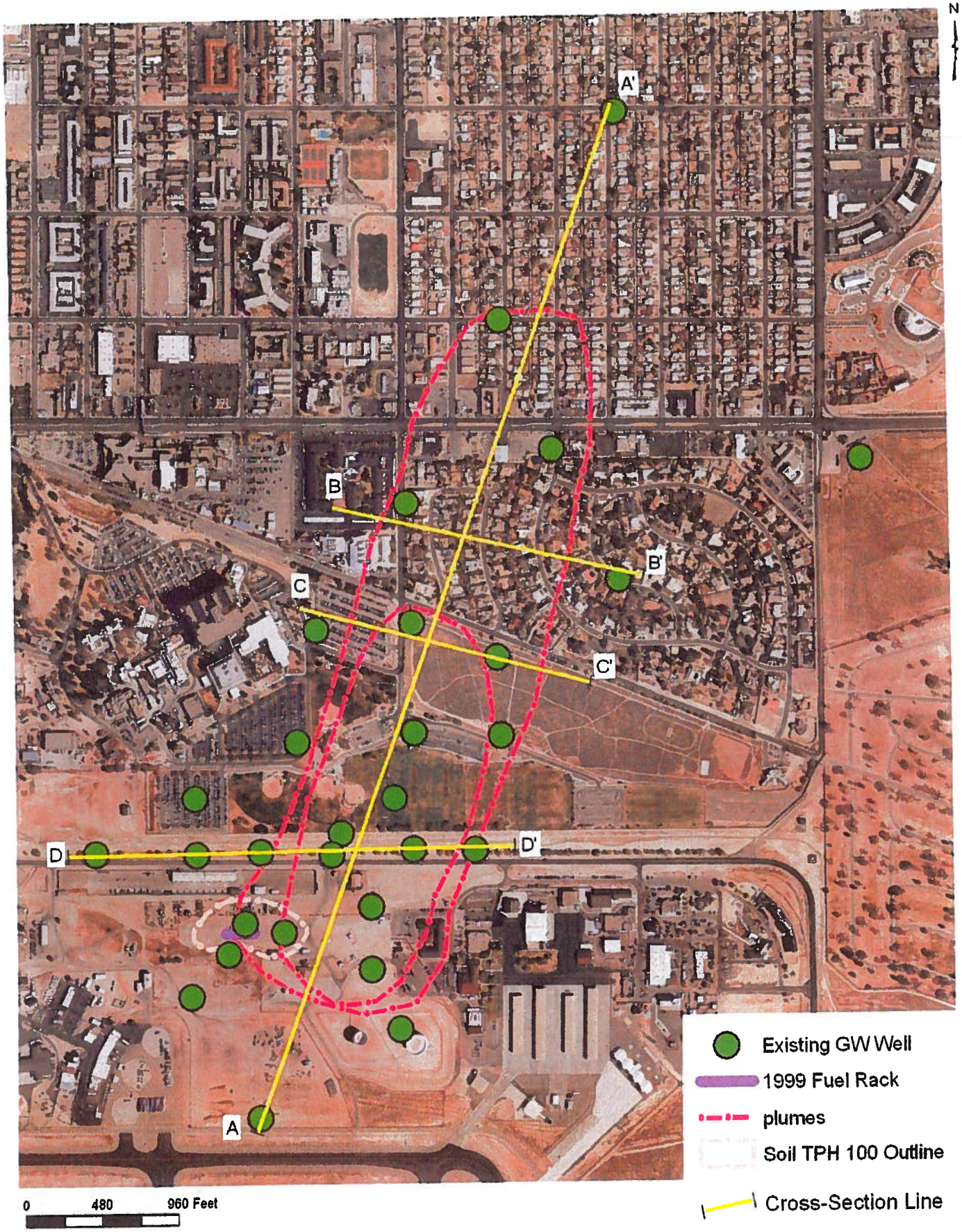

Figure 4. Existing Well and Cross-Section Locations