

Resolution Number: WPR-2018-02

**Water Protection Advisory Board
Kirtland Air Force Base Bulk Fuels Facility Jet Fuel Leak Project Resolution
FINAL July 13, 2018**

Background

The Water Protection Advisory Board (WPAB) is composed of community members appointed by the City of Albuquerque (City), Bernalillo County (County), and the Albuquerque Bernalillo County Water Utility Authority (Water Authority). As established by ordinance, WPAB is tasked with oversight of implementation of the Water Quality Protection Policy and Action Plan (WQPPAP) that is currently being updated. As part of that mission, WPAB is charged with advocating for effective protection of surface and groundwater quality as well as the study of surface and groundwater protection concerns so that WPAB can make recommendations to the City, County, and Water Authority as appropriate. On March 9, 2018, WPAB approved updated WQPPAP policies that emphasize the importance of a proactive approach in source water protection. Additionally, Policy C guides the City, County, and Water Authority to identify groundwater contamination and expedite corrective action.

To fulfill its mission, WPAB has received regular project updates from both the United States Air Force (USAF) and the New Mexico Environment Department (NMED) on the progress of Resource Conservation and Recovery Act (RCRA) site investigation and cleanup activities for the jet fuel contamination at the Kirtland Air Force Base (KAFB) Bulk Fuels Facility (BFF) jet fuel leak project site. Additionally, WPAB members have attended joint USAF and NMED quarterly public meetings and have reviewed the annual NMED Strategic Plans. The WPAB strongly advocates for rapid and effective progress towards addressing the known groundwater contamination and addressing the remaining source.

On March 6, 2018, NMED released a draft of the 2018 Strategic Plan for the jet fuel leak project site that presented Monitored Natural Attenuation (MNA) as a new strategy (#2 in the draft document dated March 6, 2018) to protect Albuquerque's aquifer and drinking water supply wells near the BFF project. The WPAB feels strongly that MNA should not be a primary remediation strategy for the BFF site and that engineered technologies (#3 in the draft document) need to continue as the primary cleanup strategy. The board acknowledges that the NMED is currently revising the draft 2018 Strategic Plan and is hopeful that the final plan will reaffirm an assertive and active approach to remediating the site. WPAB will continue to monitor the progress of site remediation and advocate for rapid and effective cleanup of groundwater contamination in our aquifer.

Findings

Following review and discussion of NMED's 2018 Strategic Plan at the April 13, 2018 and May 11, 2018 meetings along with recommendations received from the Policy Implementation Committee (PIC) the WPAB has the following findings:

- The NMED and the USAF have not installed nor have committed to a firm deadline to install a deep interval, down-gradient groundwater monitoring well that the Water Authority has repeatedly requested to address an existing vertical data gap in the northernmost portion of the dissolved-phase ethylene dibromide (EDB) plume. Stratigraphic sections prepared for the site and the most recent water table maps (Quarter 4, 2017) demonstrate the necessity of installing this monitoring well. The WPAB strongly urges the installation of this new well.
- Key stakeholders, including the City and Water Authority, are concerned that there has been a break down in the collaborative process; previous consensus-based decisions have been later disregarded.
- The BFF project is at a decisive moment as the project shifts from site characterization and the NMED considers initiating the Corrective Measures Evaluation (CME) to select the final remediation technology(s) for the site.

Recommendations:

Based on the information available to WPAB in the NMED 2018 Strategic Plan and after much deliberation, the WPAB has the following recommendations:

1. NMED should require the USAF to install a deep, down-gradient groundwater monitoring well at the location identified in the Final Work Plan submitted by the USAF on December 20, 2017. This location was negotiated by the Water Authority and the USAF during the September 2017 working group meetings and represents a location that the technical working group members agreed would adequately fill the data gap and provide the Water Authority confidence in the deep interval of the EDB plume. The February 28, 2018 letter of approval with conditions for the data gap monitoring wells does not include a reason for relocating this deep, down-gradient groundwater monitoring well (KAFB-106240). No justification has been given for not installing this well which is needed to ensure protection for drinking water resources.
2. NMED and the USAF should reassemble the technical working groups composed of multi-stakeholders and contractors to develop remediation technology options for the CME. The suggestions and concerns of the members should be incorporated into future plans or the reasons for not implementing these decisions should be thoroughly documented.
3. Transparency and the emphasis on public involvement should be maintained and enhanced. In addition to the quarterly public meetings, the public should be provided with easy and timely access to meeting summaries from technical working groups, documenting decisions that were made and deliverables to be submitted by the USAF.
4. As part of continued transparency, the USAF is invited to provide the WPAB with presentations and/or letters documenting the evaluation of remediation criteria as part of the CME and selection of the final remedy(s) for the BFF site. This will assist WPAB in fulfilling their mission of studying, advising, and advocating for the protection of groundwater resources in the City and County.
5. An independent evaluation of the site should be completed prior to initiation of the CME. A complex site such as the BFF with the volume of data collected to date would be well served by a comprehensive technical review. The evaluation could be completed by a contractor to the NMED or could potentially follow a model similar to the Independent External Peer Review. The

NMED's hiring of a contractor to review the plume capture model and the Water Authority's work on the RCRA Facility Investigation (RFI) report and modeling are examples of how an external evaluation can benefit the project. The goal would be to assess existing data and determine data quality, usability, and completeness along with a review of the site conceptual model. Engagement of this independent peer review prior to the start of the CME would provide the NMED, the USAF, stakeholders, and the public a chance to proactively address any potential data concerns or issues resulting in a more complete and confident starting point for evaluating remedies.