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October 28, 2020

Title, First, Last

Address1

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Subject: Water Protection Advisory Board Concerns Regarding the Kirtland Air Force Base Bulk Fuels Facility Jet Fuel Leak Investigation and Remediation Status

Dear Title Last:

The Water Protection Advisory Board's (WPAB) was established by joint ordinance to purpose-is-to study and advise the City of Albuquerque, Albuquerque Bernalillo County Water Utility Authority (Water Authority), and Bernalillo County on surface and groundwater protection concerns and to advocate for effective protection of surface and groundwater quality. Further, it is in the WPAB's 2020 Work Plan to foster intergovernmental coordination, cooperation and communication by advocating for improved public outreach on water quality issues by governmental agencies. Of utmost importance to the WPAB is the continued protection of surface and groundwater quality in the Water Authority's service area so that public health, quality of life, and economic vitality of current and future generations are not diminished.

In the spring and summer of 2018, the WPAB received updates from the United States Air Force (USAF) and the New Mexico Environment Department (NMED) on the progress of the Resource Conservation and Recovery Act (RCRA) site investigation and cleanup activities at the Kirtland Air Force Base (KAFB) Bulk Fuels Facility (BFF) jet fuel leak project site (the Site). At that time the WPAB adopted Resolution Number: WPR-2018-02 (the Resolution) addressing its findings and concerns regarding the status and continued investigation and remediation activities at the Site.

Two years later, after the October 9, 2020 presentations to the WPAB on the status of the Site by the Water Authority and NMED, the WPAB regrets that it must again address several of the issues that were discussed in the Resolution. The Resolution is attached to this letter to highlight the similarities in the concerns that WPAB raised in 2018.

The WPAB wants to emphasize that if appropriate and aggressive remediation does not occur at the Site, drinking water resources for the public water supply will be unavailable. The WPAB now wishes to address four key areas of concern and where it believes further work and coordination will result in a more comprehensive analysis of the site, and, ultimately, better protection of the public drinking water supply.

1. Stakeholder Involvement. WPAB has heard concerns from stakeholders that they are no longer being courtesy copied on key correspondence or reports from the USAF or NMED that directly impact

their review of the Site and their work related to the Site. It is imperative that stakeholders remain informed and be provided with copies of reports and correspondence. It is especially important for the Water Authority to be included, as the Site's remaining contaminants have potential direct impacts on groundwater used for drinking water. The WPAB is aware of the recent solicitation to establish a Restoration Advisory Board (RAB) and urges the USAF to ensure that stakeholder involvement is still prioritized if a RAB is convened.

2. Technical Working Group. It is the WPAB's understanding that the Technical Working Group composed of representatives from stakeholder groups has not been convened for at least two years, despite members of the Technical Working Group meeting NMED's stated conditions for calling for such a meeting. The WPAB believes it is imperative that the Technical Working Group begin holding regularly scheduled meetings to allow the stakeholders an opportunity to provide input, analyze new data, and participate in the Site investigation that continues while the USAF prepares its Phase II RCRA Facility Investigation Report.

3. Data Gaps. NMED and USAF must address specific areas of identified data gaps as follows: (1) establish the depth of the ethylene dibromide (EDB) contamination in groundwater at the northern edge of the plume, (2) determine the extent of remaining fuel in soil that is off-base as there are data quality issues and inconclusive results in this existing testing and monitoring data, (3) examine the shallow soil vapor nature and extent that is off base, and (4) eliminate the gap in data in sampling of field parameters and fuel contaminants. The Water Authority has repeatedly requested the USAF install a deep interval down-gradient groundwater monitoring well at the northernmost portion of the EDB plume. This well will provide much of the data needed to eliminate some of the aforementioned data gaps. The WPAB again strongly urges the installation of this well.

4. Access to Public Information. It has been brought to the WPAB's attention that the information related to this site, which is public and part of the administrative record for the Site, is not being made available in a timely or readily accessible fashion on a public platform. The WPAB feels this is something that should be easily remedied, and that updating the administrative record should be a high priority for NMED. NMED should also require that the USAF bring their administrative record into compliance with the terms of their RCRA permit as soon as possible. Transparency and access to information regarding the Site for review by the public, stakeholders, and other interested parties will create greater trust for everyone involved.

The WPAB strongly encouragesurges continued and improved public engagement by NMED and the USAF regarding Site examination and clean up. Further, the WPAB requests regular updates from NMED and the USAF regarding the status of the investigation and development of the Phase II RCRA Facility Investigation Report.

Respectfully,

Julia Maccini, Chair  
Water Protection Advisory Board

Enclosure: 2018 Water Protection Advisory Board Resolution WPR-2018-02

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