



Albuquerque Bernalillo County Water Authority

Albuquerque/Bernalillo
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Status Update for the Kirtland Air Force Base Bulk Fuels Facility Fuel Leak Cleanup

The Water Authority continues to monitor the progress of corrective action activities being conducted by the U.S. Air Force and the Air Force Civil Engineering Center (AFCEC) to address the Bulk Fuels Facility (BFF) jet fuel leak that has contaminated the aquifer near the Ridgecrest Well Field. Recent activities have included the continued operation of the pump and treat interim measure, testing of the bioventing interim measure, and continued quarterly sampling of groundwater and soil vapor. The Air Force submitted a *Source Zone Characterization Report* that is currently in review with the NMED; Water Authority is reviewing and will submit comments to the NMED.

Water Authority staff continue to review data, work plans, and reports submitted by the Air Force to the NMED. The concerns identified in the Water Authority board's letter to the Air Force in June 2019 remain:

- 1) *Uncertainty in the budget allocated for the site* - Without a budget breakdown it is not possible to verify the Air Force statements that there is enough budget for ongoing site activities (e.g., monitoring, pump and treat, etc.). The budget number provided by the Air Force of \$1.3M is a substantial decrease in funding from previous years.
- 2) *No source area interim measures* - Despite multiple datasets indicating persisting contamination in the source area, on and off base, no additional remediation is being discussed or planned. Until the source area is remediated contamination of groundwater will continue.
- 3) *Flawed Air Force groundwater model* - The Air Force continues to use a groundwater model that likely overstates the effectiveness of capture and progress of plume collapse. Critical concerns include the lack of model calibration, biased-high pumping rates, and lack of independent review.
- 4) *Data gaps in characterization of contamination* - The Water Authority provided comment on the 2017 RCRA Facility Investigation (RFI) Report. A revised RFI Report, titled *Phase I RFI Report*, was submitted in 2018 and none of the comments or concerns submitted by the Water

Authority were addressed. This document remains in review with the NMED. It is unclear how the concerns in technical analysis and data gaps will be addressed to reach a final RFI Report. An NMED-approved, final RFI Report is the critical step to proceeding with the Corrective Measures Evaluation.

No technical working group meetings have occurred since August 6, 2019. The Air Force has held one public meeting since their last presentation to the Water Authority governing board in August 2019.

STAFF COMMENTS:

Water Authority staff have identified questions and concerns in the groundwater data and performance modeling that warrants a technical working group discussion. The Water Authority is an advocate for reconvening the informal, technical discussions for the project. These technical discussions provide an efficient and effective forum for evaluating data and determining a path forward, keeping a pace of rapid progress on the site. There are currently no technical working group meetings scheduled.

FISCAL IMPACT:

None