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AR Doc #3665
L.W.B.
12-23-2013



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 20, 2013

Colonel Tom D. Miller
Base Commander
377 ABW/CC
2000 Wyoming Blvd. SE
Kirtland AFB, NM 87117-5606

John Pike
Director, Environmental Management Services
377 MSG
2050 Wyoming Blvd. SE, Suite 116
Kirtland AFB, NM 87117-5270

**RE: PHASE II REMEDIATION INTERIM MEASURES PLAN
SOIL-VAPOR EXTRACTION TREATMENT SYSTEM DESIGN
BULK FUELS FACILITY SPILL
SOLID WASTE MANAGEMENT UNITS ST-106 AND SS-111,
KIRTLAND AIR FORCE BASE, EPA ID#NM9570024423
HWB-KAFB-12-024**

Dear Col. Miller and Mr. Pike:

The New Mexico Environment Department (NMED) Environmental Health Division (EHD) has received the U.S. Air Force's (the Permittee) revised *Phase II Remediation Interim Measures Plan, Soil Vapor Extraction Treatment System Design, Bulk Fuels Facility Spill Solid Waste Management Units ST-106 and SS-111* (PRIMP) dated August 26, 2013. The revised PRIMP was submitted in response to NMED's Disapproval dated May 23, 2013. The SVE treatment system (SVE), installed at the end of December 2012, began continuous operation in January 2013.

On pg. 3-2, Section 3.2, Performance Based Criteria, references a design capacity of 2,200 pounds per day (90pounds per hour) of hydrocarbon removal based on the CATOX system capacity. A memorandum prepared by the Permittee's supplied to NMED on December 4, 2013, indicates that the Soil Vapor System (SVE) is currently treating 55 pounds per hour. It has been demonstrated that the CATOX unit currently operating has not achieved the anticipated



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destruction rate of hydrocarbons. Nonetheless, the CATOX system has effectively removed hydrocarbons from the soil vapor.

The Permittee assert that their revised SVE equipment, CATOX system as opposed to the THERMOX system is based in the National Fire Protection Association guidelines for ducts and equipment subject to potential explosive gas mixtures for operating in the fuels yard. NMED will consent to the analysis of the Permittee on their interpolation of these guidelines. NMED has determined that the use of the CATOX system has provided valuable data for further assessment of soil vapor treatment technologies. Further development and expansion of the SVE system is required and will be addressed in future work plans.

As specified in NMED's May 23, 2013 Disapproval, as-built design drawings are necessary to complete the record. These drawings shall be submitted in a separate report or as part of the RFI report.

The NMED Environmental Health Division approves the revised PRIMP as submitted.

Should you have any questions, please contact me at (505) 827-2855.

Sincerely,



Tom Blaine, P.E.
Director
Environmental Health Division

cc: S. Reuter, NMED PSTB
J. Schoeppner, NMED GWQB
B. Gallegos, AEHD
F. Shean, ABCWUA
L. King, EPA-Region 6 (6PD-N)