

DEPARTMENT OF THE AIR FORCE 377TH AIR BASE WING (AFGSC)



DEC 0 4 2015

Colonel Eric H. Froehlich 377 ABW/CC 2000 Wyoming Blvd SE Kirtland AFB NM 87117-5600

Ms. Kathryn Roberts
Director, Resource Protection Division
New Mexico Environment Department
Office of the Secretary
PO Box 5469
Santa Fe, NM 87502-5469

SUBJECT: Request for extension to submit Bulk Fuels Facility Groundwater Treatment System Operations & Maintenance Plan

Dear Ms. Roberts

On 20 October 2015, New Mexico Environment Department (NMED) granted an extension to submit the draft Operations & Maintenance Plan (O&M Plan) for the Bulk Fuels Facility (BFF) full-scale Groundwater Treatment System (GWTS) from the original submittal date of 30 September 2015 to 01 December 2015. The reasons for this extension request were to allow Kirtland Air Force Base (KAFB) time to complete the evaluation of disposition options for the treated groundwater and to incorporate the results of this evaluation into the O&M Plan. KAFB is still evaluating potential disposition options for the treated groundwater [e.g. The Class V Underground Injection Control Well Pilot Test at KAFB-7 and the evaluation of the percolation data from the potential infiltration gallery locations]. In addition, EA Engineering, Science, and Technology, Inc. (EA) will be taking over the operation of the GWTS early 2016 and would need to revise any O&M Plan written by current contractor, CB&I.

A discussion occurred with Ms. Diane Agnew of NMED regarding a second extension request for the submittal of the O&M Plan. Ms. Agnew agreed that the O&M Plan should not be submitted to NMED until the construction of the full scale GWTS was complete and the evaluation of water disposition options was farther along. Based on these considerations, KAFB respectfully requested an 18 March 2016 submittal date, which was approved in a 25 November 2015 email from Ms. Agnew. As requested by Ms. Agnew in her email approval of the second



extension request, KAFB has submitted this formal written request for the administrative record.

Sincerely,

ERIC H. FROEHLICH, Colonel, USAF

Commander

cc:

NMED-EHD (Roberts, McQuillan, Agnew) NMED-HWB (Keiling, Cobrain) USACE (Phaneuf, Goodrich, Simpler)