

Cobrain, Dave, NMENV



KAFB ST-106, ST-111
Bulk Fuels Spill
Interim Measures
Corrective Action

From: Cobrain, Dave, NMENV
Sent: Thursday, August 22, 2013 9:23 AM
To: Kieling, John, NMENV
Subject: KAFB-CB&I (Shaw) comments on draft extraction well letter

John,

I've looked over the KAFB-CB&I edits to our draft letter requiring development and testing of the extraction well (KAFB-106157). The edits introduce a level of vagueness that has potential consequences for NMED's ability to evaluate the results of the necessary aquifer testing. The few specifics they introduced are provided without an accompanying rationale. In addition, KAFB-CB&I edited out the requirement for submittal of a work plan. Besides being a permit requirement, work plans spell out proposed methods and procedures and rationale for the proposed actions that is completely missing from this letter. Work plans and due dates are enforceable whereas commitments made in meetings and public presentations are not. The concern is that if KAFB doesn't meet the public schedule or meets that schedule with deficient work products, then next summer, when all this work is due to be completed, there will be nothing to enforce and we'll be building the compliance requirements and schedule from scratch. That will result in at least a year delay and probably much longer delays to implement effective remediation of the BFFS contamination.

Dave

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