

KAFB BFFS Draft 12/11/13
ST-106 AND SS-111 SVE



NEW MEXICO
ENVIRONMENT DEPARTMENT

Environmental Health Division



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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 11, 2013

Draft

Colonel Tom D. Miller
Base Commander
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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.

The PRIMP states that the maximum hydrocarbon treatment capacity of the SVE is approximately 90 pounds per hour (lbs/hr). The SVE replaced four soil vapor extraction internal combustion units with a combined capacity of 70 lbs/hr. Based on the Permittee's Quarterly Pre Remedy Monitoring and Site Investigation Report for January-March 2013 the system appeared to be operating at 47 lbs/hr or 52% of capacity during the first quarter of operation. A



Col. Miller and Mr. Pike
December 11, 2013
Page 2

memorandum prepared by CB&I (dba Shaw), supplied to NMED on December 4, 2013, indicates that the SVE is currently treating 55 lbs/hr or approximately 61% of design capacity.

NMED understands that the Permittee is in the process of conducting pilot testing with the intent to expand the soil vapor extraction system. NMED also understands that the Permittee intends to reconfigure the current soil vapor extraction system to connect three additional (Pneulog) extraction wells to the inlet to the operating CATOX vapor treatment system. The Permittee does not propose to expand the hydrocarbon vapor treatment capacity of the existing CATOX system as part of the reconfiguration. On December 4, 2013, the Permittee asserted that it must receive approval of the PRIMP before it can begin to design the connections from the Pneulog wells to the SVE. NMED's May 23, 2013 Disapproval required the submittal of as-built design drawings, since the soil vapor extraction system had been constructed the previous January. Two of the 32 design drawings submitted with the revised PRIMP were dated July 2013. The other 30 design drawings were dated either 2011 or 2012. None of the drawings were labeled as as-built drawings in the revision; therefore the revised PRIMP did not include all information required by NMED's May 23, 2013 Disapproval. Nevertheless, in the interest of facilitating the anticipated design for connection of the Pneulog wells to the SVE system, 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: J. Kieling, NMED HWB
S. Reuter, NMED PSTB
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