

ENTERED

KAFB BFFS
515-1060 and 155-111
Treatability Study

From: Cobrain, Dave, NMENV
Sent: Monday, May 05, 2014 3:02 PM
To: Blaine, Tom, NMENV; Kieling, John, NMENV; Reuter, Stephen, NMENV
Cc: Brandwein, Sid, NMENV; Moats, William, NMENV; Wear, Benjamin, NMENV; McDonald, William, NMENV;
Torcoletti.Paul@epa.gov; hubner.tara@epa.gov
Subject: CB&I TreatatI

Tom,

For your use to allow CB&I to proceed with the anaerobic treatability tests.

Dave

Main HWB Phone: 505-476-6000
Direct Office Phone: 505-476-6055
Fax: 505-476-6030 or 505-476-6060

NMED recognizes that the core samples from replacement well 10612R have been collected and sent to CB&I's New Jersey facility pending start of the testing and that the start of the study could be affected by delays in the start of the testing. NMED assumes that core will be obtained or has already been collected from well boring KAFB-106210 for the same purpose. CB&I may proceed with implementation of the treatability study work plan received by email on May 2, 2014.

NMED understands the following work plan provisions:

1. Core samples were or will be collected using an acetate-lined coring device.
2. The Permittee will collect groundwater samples from the wells (KAFB-10612R and KAFB-106210) using standard method-specific sample containers in conjunction with the collection of the samples in soda kegs for analyses at an off-site laboratory for all methods listed in Section III of the Work Plan for cations (e.g., Fe, Mn) and GRO and DRO using modified EPA Method 8015.
3. As described in Work Plan Section IV, the Permittee will replicate the microcosm testing by sending full duplicates of 10% of the microcosms to an independent laboratory for testing using the same processes and testing and analytical methods used at CB&I's laboratory to conduct the tests. Should CB&I modify its procedures during the tests, it will notify the independent laboratory of the changes within sufficient time so that the independent laboratory can duplicate the changed procedures. Instead of replicating treatment 10, the Permittee must replicate either treatment 6 or treatment 7.



Cobrain, Dave, NMENV

From: Cobrain, Dave, NMENV
Sent: Thursday, May 22, 2014 5:23 PM
To: Blaine, Tom, NMENV; Kieling, John, NMENV; Reuter, Stephen, NMENV
Subject: RE: CB&I TreatatI
Attachments: FW: Treatability Test Work Plan - approval requested

Tom,

Only by your email (attached). I assume that's why CB&I requested an approval for the treatability study work plan that you mentioned yesterday (in the same attached email). I discovered this issue while preparing the letter.

Dave

Main HWB Phone: 505-476-6000
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From: Blaine, Tom, NMENV
Sent: Thursday, May 22, 2014 5:11 PM
To: Cobrain, Dave, NMENV; Kieling, John, NMENV; Reuter, Stephen, NMENV
Subject: RE: CB&I TreatatI

Did we approve a Work Plan for this?

From: Cobrain, Dave, NMENV
Sent: Thursday, May 22, 2014 10:59 AM
To: Blaine, Tom, NMENV; Kieling, John, NMENV; Reuter, Stephen, NMENV
Subject: FW: CB&I TreatatI

Tom,

Tom,

Your email to Mike Amdurer on May 7th authorizing CB&I to proceed with the testing did not include the contents of the email below. Did you ever send these comments to CB&I? If not, then there's a problem. CB&I won't be sending any duplicate samples to an independent laboratory for replicate testing or necessarily conducting the other actions listed in the email. That would be a problem going forward regarding the defensibility of the test and the acquisition of data for use in making comparisons. I only have an emailed copy of the April 23rd version of the plan and was not copied on any email correspondence you may have sent the Air Force or CB&I related to the comments below. If the comments were not adequately addressed in the final work plan, then authorization to proceed rather than any kind of approval would be the appropriate content of the letter you asked for in your email yesterday afternoon.

Dave

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