NEW MEXICO ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.nmenv.state.nm.us

SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

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Secretary

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Deputy Secretary

JAMES H. DAVIS, Ph.D.
Director
Resource Protection Division

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 11, 2012

Colonel John Kubinec
Base Commander
377 ABW/CC
2000Wyoming 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: APPROVAL
SOIL VAPOR EXTRACTION SYSTEM COMPONENTS PARTIAL DESIGN, INTERIM MEAURES WORK PLAN, BULK FUELS FACILITY SPILL, SOLID WASTE MANAGEMENT UNITS ST-106 AND SS-111, ADDENDUM MAY 2012, JUNE 2012 AND WEEKLY REPORTS
KIRTLAND AIR FORCE BASE, EPA ID# NM9570024423
HWB-KAFB-11-010

Dear Col. Kubinec and Mr. Pike:

The New Mexico Environment Department (NMED) has reviewed the document *Soil Vapor Extraction System Components Partial Design, Interim Measures Work Plan, Bulk Fuels Facility Spill, Solid Waste Management Units ST-106 and SS-111, Addendum May 2012,* dated June 4, 2012. In this document, Shaw Environmental and Infrastructure, Inc., contractor for the U. S. Air Force (Permittee), proposes major components for a new soil-vapor extraction (SVE) system to be constructed for remediation of petroleum contamination in the vadose zone at the Kirtland Air Force Base Bulk Fuels Facility.

As you are aware, the NMED and the Permittee have been and continue to be criticized concerning the delay in moving forward with the installation and operation of the new SVE system. NMED considers this criticism justified and is expecting that the Permittee expedite the design and construction of the new SVE system.

The NMED hereby approves the components presented in the subject document for the new SVE system.

In addition, the NMED further directs the Permittee to provide weekly status reports to the NMED concerning the progress made on the new SVE system:

a. status of purchasing the system;
b. status of completing the design;
c. status of installation (including the installation of natural gas and electrical power support for operation of the SVE system and purchase of components, equipment, or other materials to build the system);
d. acquisition of the air permit to operate system; and
e. conduct testing and shake out procedures.

The weekly status reports for the new SVE system shall be made part of the weekly status reports currently provided to the NMED by the U. S. Corp of Engineers.

NMED reserves the right to require modification of or to add additional capacity to the new SVE system at any time for purposes of protecting human health and the environment or to complete remediation of the Bulk Fuels Facility Spill within a reasonable time period.

Futhermore, as discussed at the April 5, 2012 meeting between NMED and the Permittee, the NMED is concerned with the timeline of submission and implementation of the following actions: the enhanced well development of the Light Non-Aqueous Phase Liquid (LNAPL) well; preparation of the application to modify the Permittee's RCRA permit to incorporate a remedial action plan (RAP); and a method and location to discharge treated groundwater originating from the proposed LNAPL containment system, should such a system be placed into operation. The latter information is needed to complete the application for the RAP. The NMED requires that a status of these activities also be provided in the weekly activity report.

If you have any questions regarding this letter, please contact William Moats of my staff at (505) 222-9551.

Sincerely,

John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Martin, NMED Secretary
J. Davis, NMED RPD
W. Moats, NMED HWB
W. McDonald, NMED HWB

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