APPENDIX E

Regulatory Correspondence between the NMED HWB and the Air Force Regarding the Letter Addendums to the LNAPL Containment Interim Measures Work Plan Part 1 – Characterization, Bulk Fuels Facility Spill, SWMUs ST-106 and SS-111

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ATTACHMENT 1

November 2011 Correspondence from Mr. Thomas Berardinelli, Director of Staff, Kirtland Air Force Base 377 ABW/DS to the NMED HWB

Subject: LNAPL Containment Well Location and Installation. LNAPL Containment Interim Measures Work Plan Part 1 – Characterization, Bulk Fuels Facility Spill, SWMUs ST-106 and SS-111, Addendum November 2011

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DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 377TH AIR BASE WING (AFMC)

NOV 28 2011

Mr. Thomas Berardinelli
377 ABW/DS
2000 Wyoming Blvd SE
Kirtland AFB NM 87117-5000

Mr. John Kieling
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Dr East, Bldg 1
Santa Fe NM 87505-6303

Mr. Kieling

Kirtland Air Force Base is submitting an Addendum to the Light Non-Aqueous Phase Liquid (LNAPL) Containment Interim Measures Work Plan Part 1 - Characterization, Bulk Fuels Facility Spill, Solid Waste Management Units ST-106 and SS-111. The original LNAPL Containment Work Plan was submitted to you in July 2011.

If you have any questions with regard to this submittal, please contact Mr. John S. Pike at (505) 846-8546.

Sincerely

THOMAS F. BERARDINELLI
Director of Staff

Attachment:
LNAPL Containment Workplan Addendum for the Bulk Fuels Facility Spill, SWMUs SS-111 and ST-106

cc:
NMED HWB - Mr. Moats, w/ atchs electronic and hardcopy
NMED GWQB - Mr. Schoeppner, w/ atchs electronic and hardcopy
NMED PSTB, Mr. Reuter, w/ atchs electronic and hardcopy
NMED HWB - Mr. McDonald, w/o atchs
NMED HWB – Mr. Brandwein, w/o atchs
USEPA-Region 6 (6PD-N), Ms. King, w/o atchs
AFCEE, Mr. Oyelowo, w/o atchs
USACE, Mr. Midgal, w/o atchs
Admin. Record, CNM, Montoya Campus w/atch
File

40 CFR 270.11
DOCUMENT CERTIFICATION
NOVEMBER 2011

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

DAVID J. HORNYAK
Colonel, U.S. Air Force

This document has been approved for public release.

KIRTLAND AIR FORCE BASE
377 ABW Public Affairs

Shaw Environmental, Inc.

2440 Louisiana Blvd NE, Suite 300
Albuquerque, NM 87110
Phone: 505.262.8928

Shaw® Shaw Environmental, Inc.

November 18, 2011

Subject: **LNAPL Containment Well Location and Installation**
LNAPL Containment Interim Measures Work Plan Part I - Characterization, Bulk Fuels Facility Spill, Solid Waste Management Units ST-106 and SS-111
Addendum November 2011
Albuquerque, New Mexico

This letter is being submitted as an addendum to the Light Non-Aqueous Phase Liquid (LNAPL) Containment Interim Measures Work Plan, prepared by Shaw Environmental and Infrastructure, Inc. (Shaw) for the U.S. Army Corps of Engineers (USACE) under contract W912DY-10-D-0014, Delivery Order 0002. This letter describes Shaw's proposal to install a single containment well at a location approximately 180 feet east of the location proposed in Figure 4-1of the work plan. Additionally, this letter describes revisions to the well design, and installation discussed in Section 6.0 of the work plan.

Shaw conducted a technical evaluation of the proposed containment well location and quantity as a result of discussing with the NMED Tiger Team on 3 November 2011. As a result of that evaluation, Shaw determined that a single containment well would be sufficient for containing the LNAPL, meeting the primary objective of the containment system and work plan. The proposed change is to move KAFB-106157 approximately 180 feet southeast of the original location (Figures 1 and 2). Figure 3 shows the predicted capture zone of this containment well, using the most recent hydrogeological data and recently acquired production well data for both Kirtland Air Force Base (AFB) wells and the Albuquerque Bernalillo County Water Utility Authority (ABCWUA) wells.

Soil cuttings will be collected and logged every 5 vertical feet from ground surface to the total depth of the well. The data that will be recorded will be as follows:

- Soil will be classified every five feet in accordance with the Unified Soil Classification System (USCS). These classifications will be applied in the field by the geologists and will be subject to revision based on laboratory tests and subsequent review by the Project Geologist.

- A full description of soil samples will be made, and will include but not be limited to, the USCS two-letter classification, consistency, soil moisture, grain size, and size distribution.

- Depth limits, and the type and number of each sample taken will be indicated. All samples will be numbered consecutively.

- Depth to water as first encountered during drilling, along with the method of determination, will be noted. Any distinct water-bearing zones below the first zone also will be noted. Other observations during drilling will be noted, such as bit chatter, rod binding, rod drops, flowing or heaving sands, bit pressure, rod rotations per minute, and water pressure.

- If drilling fluid is used, the fluid losses, the interval over which they occur, and the quantity losses, will be recorded.

- A general description of the drilling equipment used will be provided. This description, including such information as rod size, bit type, pump type, rig manufacturer, and model, may be provided in a general legend.

- Dates and times of start and completion of boring will be indicated.

- The names of the contractor, driller, and rig geologist will be noted.

- The size and length of casing or auger used in each borehole will be noted.

- Observations of visible contamination for each sample or from cuttings that appear contaminated will be made.

Field instrument readings will be noted.

In order to accommodate the documented rise in water levels in the project area, the screening interval of the LNAPL containment well has been revised from what was proposed in the work plan. Figure 4 is a schematic diagram of the proposed well construction. Below is the proposed procedure and well design for the LNAPL containment well KAFB-106157:

- The well location will be tested for utility clearance to five feet with a hand auger or a post hole digger.

- The well boring for the LNAPL containment well will be advanced using ARCH drilling method to approximately 60 feet below the water table. The well will be installed approximately 540 feet below grade at the well location.

- KAFB-106157 will be constructed with 90 feet of 8-inch diameter welded joint 0.030 slot stainless steel continuous wrap screen with double strong wires and rods, a 10-foot blank stainless steel pump sleeve section placed approximately 30 feet below the current water table, and a Schedule 40 carbon steel casing riser (Figure 2). The well will be constructed with 60 feet of screen/pump sleeve below the water table and 40 feet of screen above the water table to accommodate future water table rises. The steel well casing will extend approximately 2.5 feet above grade as a temporary completion during well development. The final depth of the pump sleeve will be decided in the field based on lithology encountered during drilling.

- Prior to start of well drilling the contractor will provide manufacturer's written documentation that the screen sections meet the design requirements, the carbon steel casing shall be marked as per design requirements, and the Contractor will confirm that the casing welder is experienced in welding of stainless steel casing.

- An engineered 10-20 sand pack filter pack will be installed in the annular space between the well casing/screen and the borehole from the bottom of the borehole to approximately 10 foot above the top of the screened interval. The filter pack will be slurried with clean potable water and tremied into place to prevent bridging and to ensure continuous placement, while the drive casing is slowly removed. A 10-foot hydrated bentonite seal will be emplaced above the sand filter pack and incrementally hydrated with potable water in 1-foot lifts.

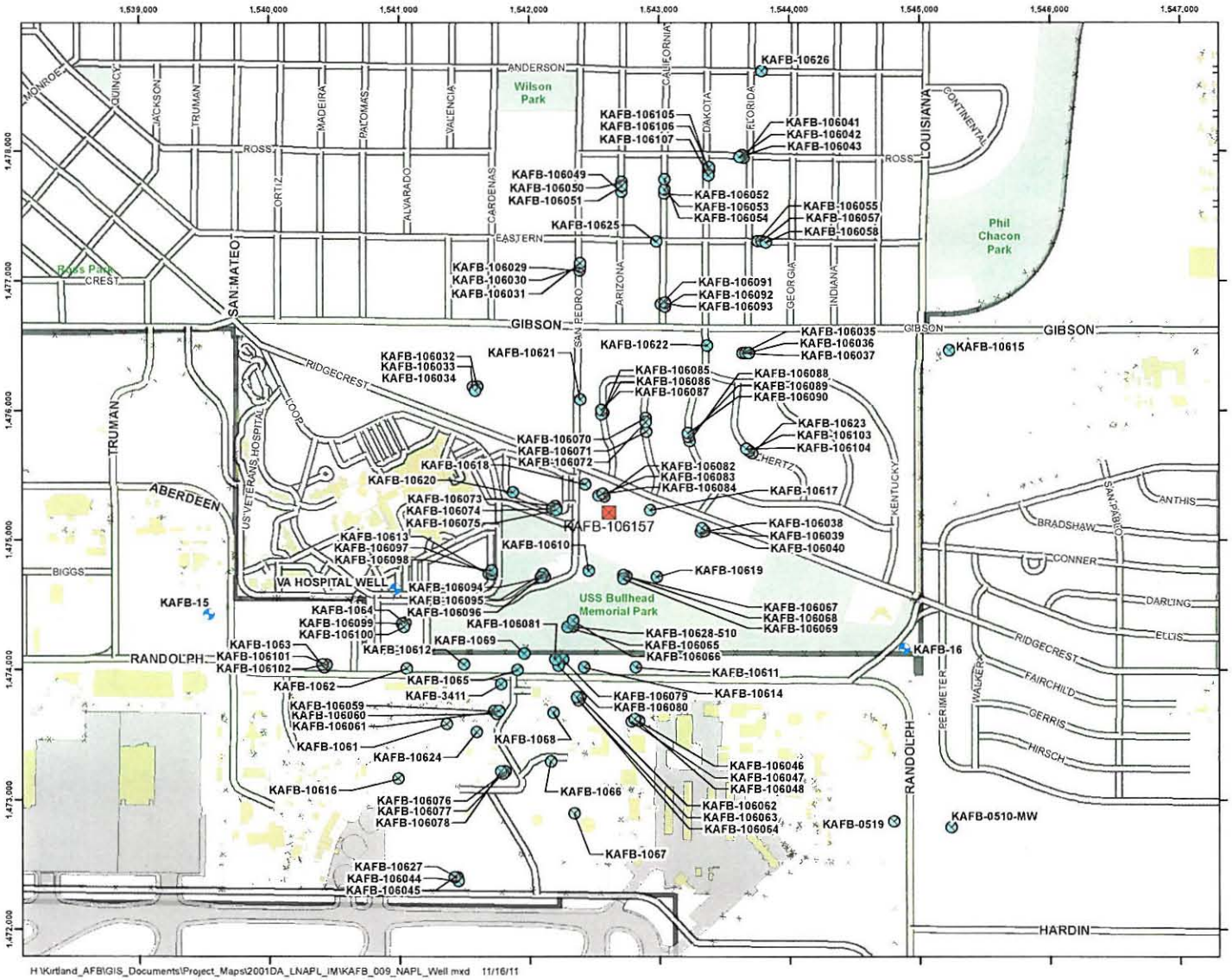
- After the last lift has hydrated for 2-hours, a cement grout with 6 percent bentonite and 2 percent calcium chloride by weight mixed at a weight density not less than 12.5 pounds per gallon will be

emplaced by tremie pipe to approximately 1.5 foot below the ground surface. The contractor will provide a mud balance and measure the grout weight density twice during placement to certify the grout specification.

- The well will be developed no sooner than 48 hours after the grout has cured and no later than 7 days. Initial development will consist of a combination of swabbing, jetting, bailing, and/or pumping until little or no sediment enters the well across the entire screened interval below the water table. The contractor will not be required to develop the screen interval above the water table.

The drive casing will be pulled from the borehole periodically during construction. Well construction diagrams will be completed for each installed well.

Section 5.1.3 describes a series of pumping tests that would be performed on the containment well(s). Shaw proposes replacing the proposed pumping tests with an enhanced well development at KAFB-106157 in order to collect the data required to complete the design of the full containment system. This will involve the installation and monitoring of a pressure transducer in KAFB-106157 during well development to measure drawdown and recovery. A full pumping test would be conducted once the full containment system including treatment system is installed and ready for operation. The well development will produce approximately 40,000 gallons of wastewater that can be containerized for disposal, thereby reducing the volume of water requiring handling as part of the discharge process.



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Legend

- Containment Well
- Monitor Well
- Water Supply Well
- Fence
- Interstate
- Major Road
- Road
- Structure
- Runway
- Park
- Installation Boundary

SITE LOCATION

N

Revision Date 11/16/11

0 400 800 1,600

Feet

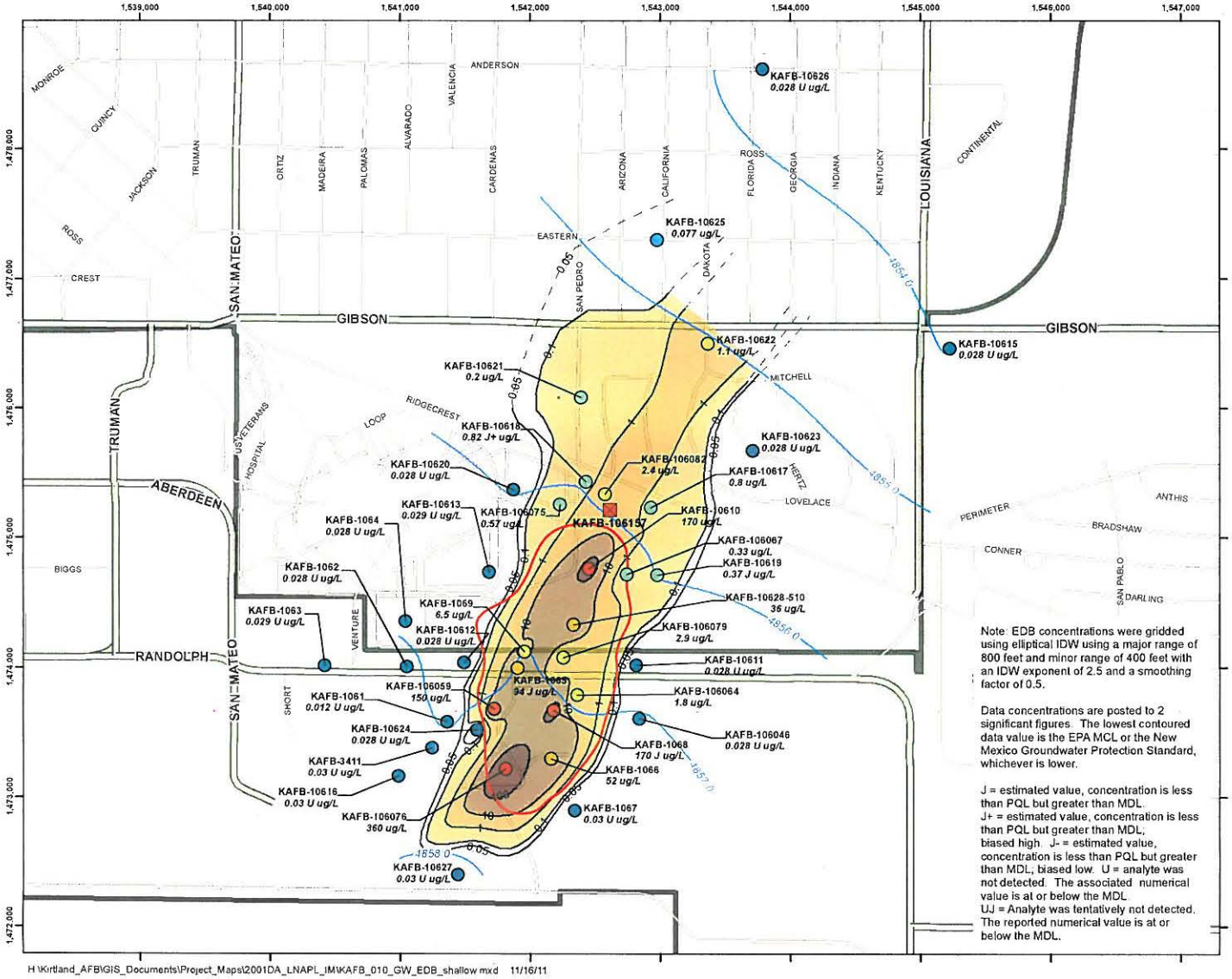
1 inch = 800 feet

Projection: NAD83 State Plane New Mexico Central FIPS3002 Feet

LNAPL CONTAINMENT INTERIM MEASURE
BULK FUELS FACILITY
KIRTLAND AIR FORCE BASE, NEW MEXICO

FIGURE 1

EXTRACTION AND
MONITORING WELL LOCATIONS



Note: EDB concentrations were gridded using elliptical IDW using a major range of 800 feet and minor range of 400 feet with an IDW exponent of 2.5 and a smoothing factor of 0.5.

Data concentrations are posted to 2 significant figures. The lowest contoured data value is the EPA MCL or the New Mexico Groundwater Protection Standard, whichever is lower.

J = estimated value, concentration is less than PQL but greater than MDL.
J+ = estimated value, concentration is less than PQL but greater than MDL, biased high. J- = estimated value, concentration is less than PQL but greater than MDL, biased low. U = analyte was not detected. The associated numerical value is at or below the MDL.
UJ = Analyte was tentatively not detected. The reported numerical value is at or below the MDL.

Legend

Location Type

- Containment Well
- Major Road
- Road
- Installation Boundary

EDB Result (ug/L)

- 0.012 - 0.050
- 0.051 - 0.10
- 0.11 - 1.0
- 1.1 - 10
- 11 - 100
- 110 - 360
- Historical Area of Observed NAPL (July 2009)
- Groundwater Level Contour (ft msl)

EDB Concentration (ug/L)

- 0.012 - 0.10
- 0.11 - 1.0
- 1.1 - 10
- 11 - 100
- 110 - 360

Revision Date: 11/16/11

N

0 400 800 1,600

Feet
1 inch = 800 feet

Projection: NAD83 State Plane New Mexico Central FIPS3002 Feet

LNAPL CONTAINMENT INTERIM MEASURE
BULK FUELS FACILITY
KIRTLAND AIR FORCE BASE, NEW MEXICO

FIGURE 2

1,2-DIBROMOETHANE
CONCENTRATIONS IN
SHALLOW GROUNDWATER

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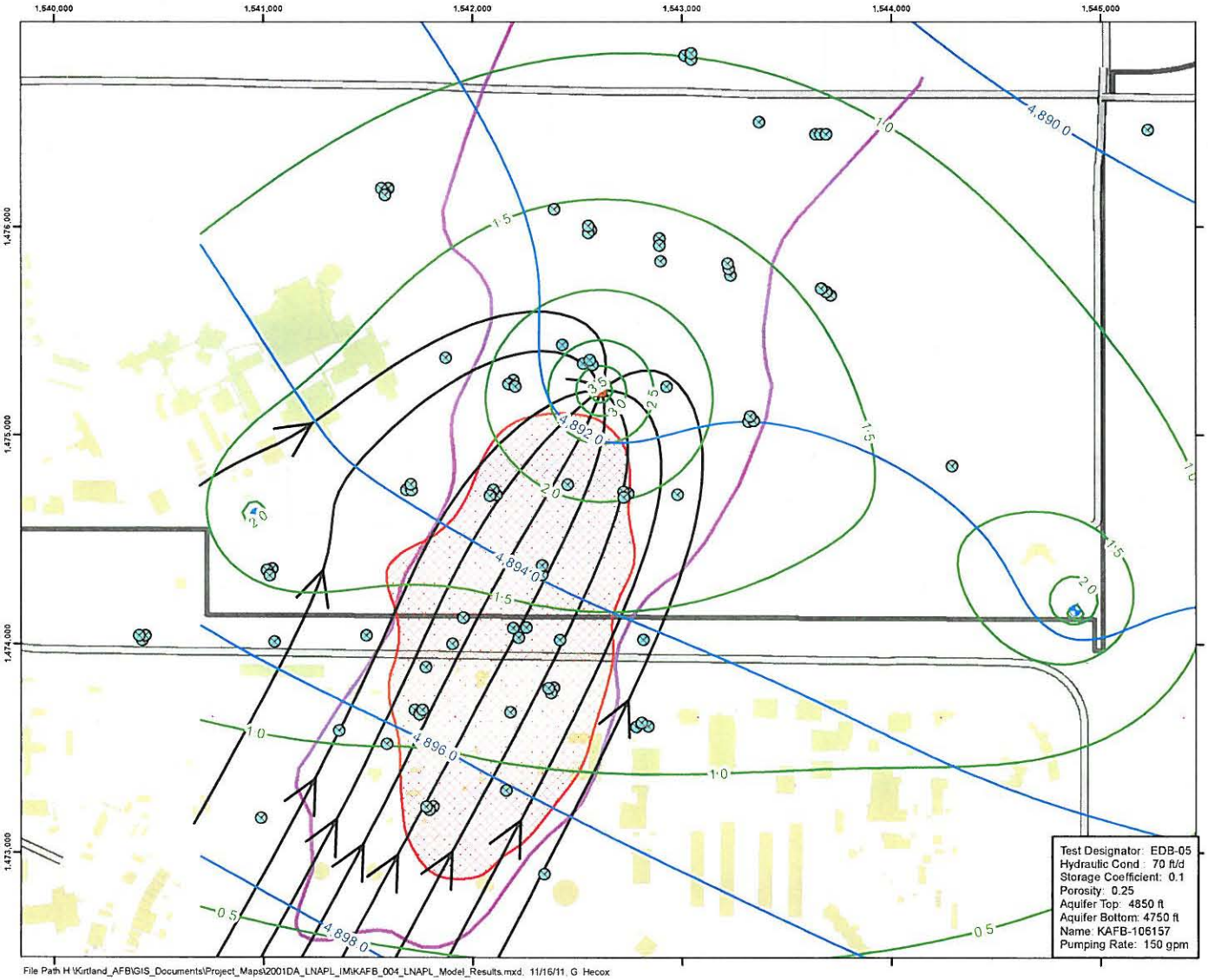

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Legend

Well Locations

Location Type

- Monitor Well
- Containment Well
- Water Supply Well

Model Results

Type

- Drawdown (ft)
- Groundwater Elev. (ft)
- Particle Track
- 10-Year Time Arrow
- Historical Area of Observed NAPL (July 2009)
- Installation Boundary

Revision Date: 11/16/11

N

0 250 500 1,000

Feet

1 inch = 500 feet

Projection: NAD83 State Plane New Mexico Central FIPS3002 Feet

LNAPL CONTAINMENT INTERIM MEASURE
BULK FUELS FACILITY
KIRTLAND AIR FORCE BASE, NEW MEXICO

FIGURE 3

KAFB-106157 CAPTURE ZONE

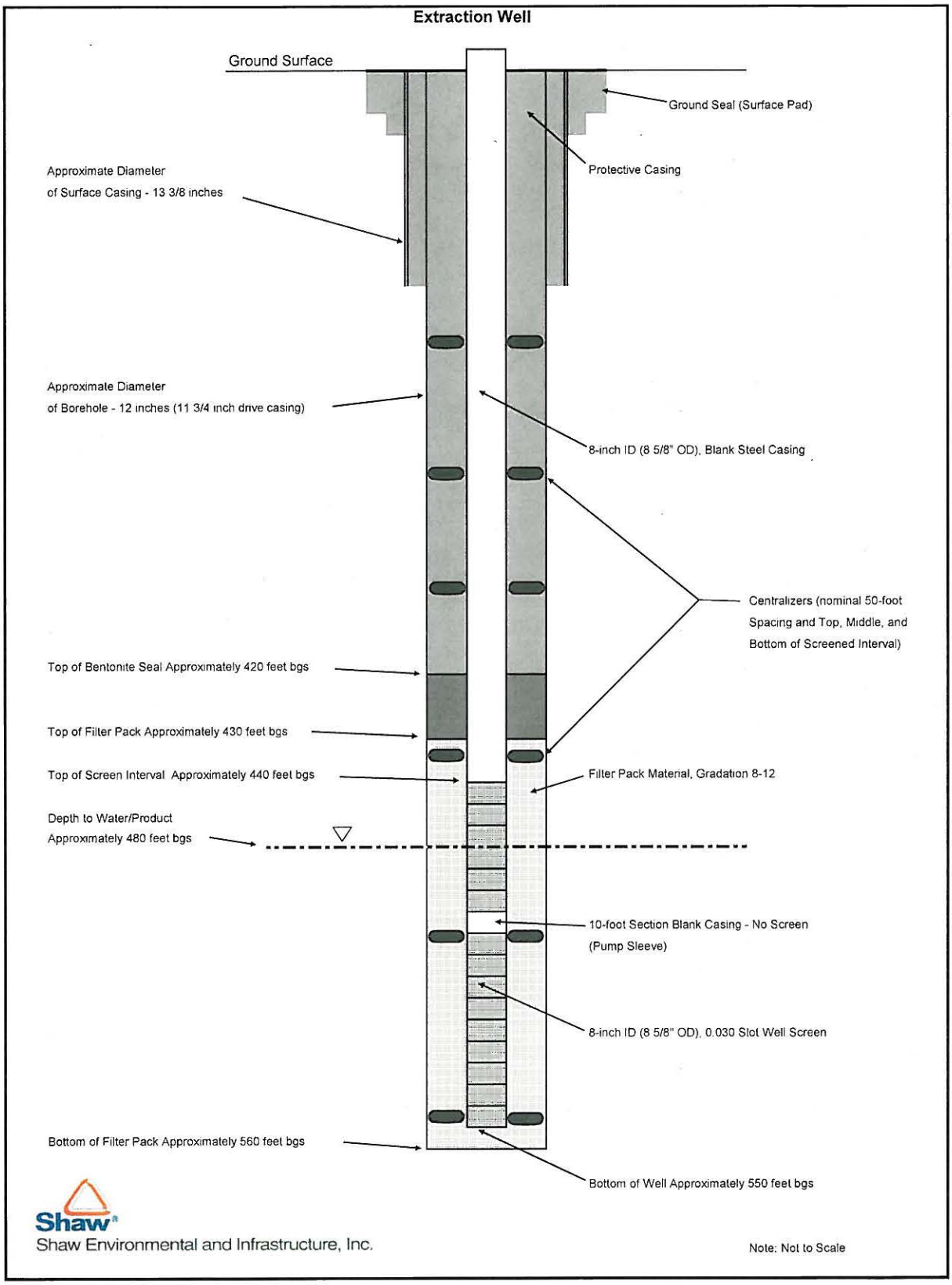

Figure 4. Extraction Well Construction

ATTACHMENT 2

December 1, 2011 Correspondence from the NMED HWB to Colonel David Hornyak, Base Commander, 377 ABW/CC and Mr. John Pike, Director, Environmental Management Section, 377 MSG/CEANR

Re: Addendum to the Light Non-Aqueous Phase Liquid (LNAPL) Containment Interim Measure Work Plan, Part 1 – Characterization Plan, Bulk Fuels Facility Spill, SWMUs ST-106 and SS-111, November 2011, Kirtland Air Force Base, HWB-KAFB-10-037

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NEW MEXICO ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

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SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

DAVE MARTIN
Secretary

BUTCH TONGATE
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 1, 2011

Colonel David Hornyak
Base Commander
377 ABW/CC
2000 Wyoming Blvd. SE
Kirtland AFB, NM 87117-5606

John Pike
Director, Environmental Management Section
377 MSG/CEANR
2050 Wyoming Blvd., Suite 116
Kirtland AFB, NM 87117-5270

RE: ADDENDUM TO THE LIGHT NON-AQUEOUS PHASE LIQUID (LNAPL) CONTAINMENT INTERIM MEASURE WORK PLAN, PART 1 – CHARACTERIZATION PLAN, BULK FUELS FACILITY SPILL, SOLID WASTE MANAGEMENT UNITS ST-106 AND SS-111, NOVEMBER 2011 KIRTLAND AIR FORCE BASE, EPA ID# NM9570024423 HWB-KAFB-10-037

Dear Col. Hornyak and Mr. Pike:

The New Mexico Environment Department (NMED) has reviewed the document *Addendum to the Light Non-Aqueous Phase Liquid (LNAPL) Containment Interim Measure Work Plan, Part 1 – Characterization Plan, Bulk Fuels Facility, Solid Waste Management Units ST-106 and SS-111,* dated November 2011 (hereafter referred to as the "Addendum"). The Addendum was submitted by the U. S. Air Force (Permittee) to the NMED by electronic mail on November 29, 2011. A hard copy of this document is to be sent by mail.

NMED approves the revisions pertaining to well design, location, installation, and borehole sampling of well KAFB-106157. The Permittee may proceed with the installation of well KAFB-106157.

NMED reserves the right that it may require that an additional extraction well be installed in the future to accomplish the goal of hydraulic containment. As indicated in NMED's letter of March 31, 2011, the capture of the LNAPL plume must be demonstrated with empirical data derived from water-level measurements showing the presence of a groundwater divide.

At this time NMED does not have enough information regarding the "enhanced well development" as proposed. Additional information will be needed to better understand this proposal.

Also, as previously discussed, all wastewater must be containerized, characterized, and disposed in an appropriate manner.

If you have any questions, please contact Will Moats, at (505) 222-9551, or me at (505) 476-6035.

Sincerely,

John E. Kieling
Acting Chief
Hazardous Waste Bureau

cc: W. Moats, NMED HWB
W. McDonald, NMED HWB
S. Brandwein, NMED HWB
J. Schoeppner, NMED GWQB
L. Barnhart, NMED OGC
B. Gallegos, AEHD
R. Shean, ABCWUA
L. King, EPA-Region 6 (6PD-N)
File: KAFB 2011 and Reading
KAFB-10-037

ATTACHMENT 3

February 7, 2012 Correspondence from Mr. Thomas Berardinelli, Director of Staff, Kirtland Air Force Base 377 ABW/DS to the NMED HWB

Subject: LNAPL Containment Well Development. LNAPL Containment Interim Measures Work Plan Part 1 – Characterization, Bulk Fuels Facility Spill, SWMUs ST-106 and SS-111, Addendum January 2012

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DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 377TH AIR BASE WING (AFMC)

Received
FEB 7 2012
District 1

AR Doc # 448
CWB
2-29-2012

FEB 7 2012

Mr. Thomas Berardinelli
377 ABW/DS
2000 Wyoming Blvd SE
Kirtland AFB NM 87117-5606

Mr. John Kieling, Manager
RCRA Permits Management Program
Hazardous Waste Bureau (HWB)
New Mexico Environment Department (NMED)
2905 Rodeo Park Road
Santa Fe New Mexico 87505

Dear Mr. Kieling

Attached please find for your consideration the Kirtland Air Force Base LNAPL Containment Well Development. LNAPL Containment Interim Measures Work Plan Part I - Characterization, Bulk Fuels Facility Spill, Solid Waste Management Units ST-106 and SS-111, Letter Addendum, 25 January 2012. The Letter Addendum is offered for review in accordance with agreements reached for continuation of the LNAPL Containment Well development in the 17 January 2012 Tiger Team meeting.

In accordance with your 22 November 2011 letter, *Notice of Disapproval: LNAPL Containment Interim Measure Work Plan, Part 1 – Characterization Plan, Bulk Fuels Facility Spill, Solid Waste Management Units ST-106 and SS-111, July 2011*, KAFB is requesting that the suspense date of 3 February 2012 for re-submittal of the revised LNAPL Containment Work Plan be extended to 30 March 2012 in order to allow incorporation of information contained with this submittal, and directed in the 17 January 2012 Tiger Team meeting, into the revised plan.

Please contact Mr. L. Wayne Bitner at (505) 853-3484 or ludie.bitner@kirtland .af.mil, or Ms. Victoria R. Martinez at (505) 846-6362 or victoria.martinez@kirtland.af.mil if you have any questions.

Sincerely

THOMAS F. BERARDINELLI
Director of Staff

2 Attachments:
1. KAFB Document Certification
2. Letter Addendum, 25 January 2012

cc:
NMED-RPD (J. Davis)
NMED-HWB (W. Moats)
NMED-HWB (W. McDonald)
NMED-HWB (B. Salem)
NMED-HWB (S. Brandwein)
NMED-GWQB (J. Schoeppner)
NMED-OGC (L. Barnhart)
EPA Region 6 (L. King)
HQ AFMC/A7AQ (Mr. McCann)
HQ AFMC/A7A1 (Mr. Fort)
AFCEE/CMSE (Mr. Oyelowo)
AFCEE/EXEC (Mr. Urrutia)
Public Info Repository (Central New Mexico)
Administrative Record/Information Repository (AR/IR)
File

Shaw Environmental, Inc.

2440 Louisiana Blvd NE, Suite 300
Albuquerque, NM 87110
Phone: 505.262.8928

Shaw Environmental, Inc.

January 26, 2012

Subject: **LNAPL Containment Well Development**
LNAPL Containment Interim Measures Work Plan Part I - Characterization, Bulk Fuels Facility Spill, Solid Waste Management Units ST-106 and SS-111
Addendum January 2012
Kirtland Air Force Base, New Mexico

This letter is being submitted as an addendum to the Light Non-Aqueous Phase Liquid (LNAPL) Containment Interim Measures Work Plan (Work Plan), prepared by Shaw Environmental and Infrastructure, Inc. (Shaw) for the U.S. Army Corps of Engineers (USACE) under contract W912DY-10-D-0014, Delivery Order 0002. This letter describes Shaw's proposal to conduct an enhanced well development in place of the proposed pumping test (Section 5.3.1).

Section 5.1.3 describes a series of pumping tests that would be performed on the containment well. Shaw proposes replacing the proposed pumping tests with an enhanced well development at KAFB-106157 in order to determine the well specific capacity needed to complete the design of the full containment system. The enhanced well development will entail:

- Standard purging and swabbing of the well screen, as described in Section 6.3.6 of the Work Plan.
- The well will be pumped for 4 to 8 hours using the well development pump to remove particulate matter from the well..
- An 8-hour constant discharge pumping test will be conducted to determine the specific capacity of KAFB-106157. The well development pump will be used for this test and the rate will be between 15 and 25 gallons per minute (gpm). The well will be undisturbed for a minimum of 12 hours prior to start of the 8-hour pumping test.
- A pneumatic slug test will be performed following the procedures in Section 5.1.2 of the Work Plan.

Water levels in KAFB-106157 will be monitored using an In-Situ transducer Troll 500 or equivalent. Water levels will be recorded on a logarithmic time interval for the duration of the test. Flow rates will be monitored using a standard totalizing water meter. Water levels in well KAFB-106082 will be monitored manually during the test.

It is estimated that the volume of waste water associated with the enhanced well development will be 20,000 to 30,000 gallons. Waste water associated with the enhanced well development will be run through a mobile 200-pound granular activated carbon (GAC) unit that can accommodate 25 gpm at 5 pounds per square inch backpressure. The GAC unit will treat the waste water to reduce the benzene concentrations to less than the hazardous concentration (0.5 milligrams per liter) prior to being placed in 20,000 gallon frak tank(s). The waste water will then be sampled for waste characterization; disposal of the waste water will be completed in accordance with the Groundwater Quality Bureau Discharge Notice of Intent to Discharge rules and regulations; this is the same method applied to purge water associated with groundwater monitoring wells at the site.

The duration of well development will be approximately 3 days, once the subcontractor arrives on site. Once approval to this letter is received, the subcontractor will be scheduled and the exact start date will be dependent on subcontractor availability. Shaw estimates completion within 45 days of the receipt of approval of this letter.

40 CFR 270.11
DOCUMENT CERTIFICATION
JANUARY 2012

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

JOHN C. KUBINEC, Colonel, USAF
Commander

This document has been approved for public release.

KIRTLAND AIR FORCE BASE
377 ABW Public Affairs

ATTACHMENT 4

February 24, 2012 Correspondence from the NMED HWB to Colonel John Kubinec, Base Commander, 377 ABW/CC and Mr. John Pike, Director, Environmental Management Services, 377 MSG

Re: Letter Addendum of February 7, 2012 for LNAPL Containment Well Development, LNAPL Containment Well Interim Measures Work Plan Part 1, Characterization, Bulk Fuels Facility Spill, SWMUs ST-106 and SS-111, Kirtland Air Force Base, HWB-KAFB-10-037

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AR Doc #433
L.W.B.
02-27-2012

SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

NEW MEXICO ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

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DAVE MARTIN
Secretary

BUTCH TONGATE
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 24, 2012

Colonel John Kubinec
Base Commander
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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: LETTER ADDENDUM OF FEBRUARY 7, 2012 FOR LNAPL CONTAINMENT WELL DEVELOPMENT, LNAPL CONTAINMENT WELL INTERIM MEASURES WORK PLAN PART 1, CHARACTERIZATION, BULK FUELS FACILITY SPILL, SOLID WASTE MANAGEMENT UNITS ST-106 AND SS-111 KIRTLAND AIR FORCE BASE, EPA ID# NM9570024423 HWB-KAFB-10-037

Dear Col. Kubinec and Mr. Pike:

The New Mexico Environment Department (NMED) is in receipt of the above referenced letter addendum submitted for Kirtland Air Force Base (KAFB)(Permittee) under cover letter from Mr. Thomas Berardinelli to Mr. John Kieling, dated February 7, 2012.

NMED approves the technical aspects of conducting the enhanced well development as described in the subject letter addendum, but understands that groundwater to be removed from the extraction well is expected to contain hazardous waste, specifically benzene at a concentration in excess of 0.5 mg/L. **A hazardous waste permit is required to treat such groundwater before the water can be discharged to the ground or otherwise land disposed.** For the groundwater to no longer contain benzene, the groundwater must be treated such that the benzene concentration is less than 0.5 mg/L. Additionally, all underlying hazardous constituents (UHCs) that may be present in the groundwater must also be treated if necessary to the appropriate treatment standards found in 20.4.1.800 NMAC incorporating 40 CFR § 268.48. For example, organic compounds such as toluene, ethylene dibromide, and xylene should be evaluated to determine if they are

UHCs and if they require treatment.

Although the NMED can issue an emergency permit under 20.4.1.900 incorporating CFR § 270.61 for treatment of hazardous waste as part of conducting the enhanced well development, the Permittee did not request an emergency permit and did not provide the minimum information necessary for the NMED to issue an emergency permit. The letter addendum did not provide information concerning what is to be analyzed, the analytical methods to be employed, the frequency of sampling prior to and after treatment, and the records and certifications that are required to be kept concerning the generation and treatment of characteristic wastes.

Should you have any questions regarding this matter please contact Mr. William Moats of my staff at 505-222-9551.

Sincerely,

John E. Kieling
Acting Chief
Hazardous Waste Bureau

cc: W. Moats, NMED HWB
W. McDonald, NMED HWB
S. Brandwein, NMED HWB
J. Schoeppner, NMED GWQB
B. Gallegos, AEHD
B. Gastian, ABCWUA
L. King, EPA-Region 6 (6PD-N)
File: KAFB 2012 and Reading