

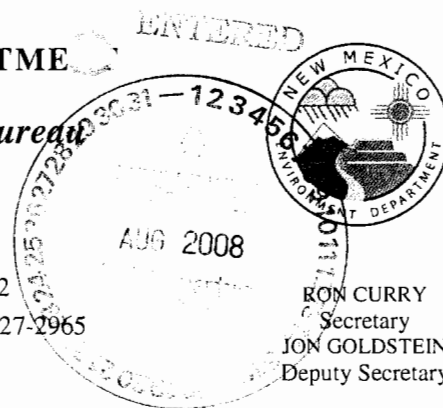


BILL RICHARDSON
Governor
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NEW MEXICO
ENVIRONMENT DEPARTMENT

Ground Water Quality Bureau

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RON CURRY
Secretary
JON GOLDSTEIN
Deputy Secretary

July 29, 2008

Mr. Wayne Bittner
US Air Force
377 ABW/EMR
2050 Wyoming Blvd. SE
Kirtland AFB
Albuquerque, New Mexico 87117-5270

RE: NMED requirement for submittal of additional elements of Modified Stage 2 Abatement Plan Report for the Bulk Fuels Facility (ST-106), Kirtland Air Force Base, Bernalillo County, Albuquerque, New Mexico

Dear Mr. Bittner;

The purpose of this letter is to summarize a meeting on July 22, 2008 between the New Mexico Environment Department Ground Water Quality Bureau (NMED) and Kirtland Air Force Base (KAFB), and provide NMED requirements in response to the information provided by KAFB in that meeting.

The following information was provided to NMED:

- The US Air Force command has ordered that emergency funds be utilized for the tentative location of five (5) "Must Drill" monitoring well locations. The completion date given was Labor Day weekend, August 29, 2008.
- In a frank exchange, KAFB environmental staff expressed their collective concerns that the distribution of LNAPL on ground water suggested a *potential ongoing fuel release* from the ST-106 facility. Staff pointed out that they believe 2 older fuel loading racks may still be tied into the newly-constructed replacement fuel piping system.
- KAFB environmental staff also expressed concern about chlorinated solvent and radioactive mixed waste discharges that took place at the Honeywell site where aircraft from above-ground nuclear explosion test observation flights landed and were decontaminated. Decontamination occurred on the three round flight aprons to the southwest of ST-106. KAFB discussed its intention to conduct a subsurface investigation, to be handled under a separate investigation plan.

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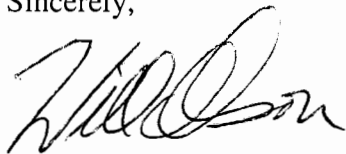
As a result of this meeting, NMED hereby requires that KAFB submit a written work plan for the immediate installation of the proposed five monitoring wells for review and approval. This required element will be considered an abbreviated Modified Stage 2 AP submittal required pursuant to WQCC § 20.6.2.4106.C.7 for the purpose of accommodating KAFB's proposed accelerated drilling schedule, and is due by August 1, 2008. NMED will provide written approval and/or comment on this plan.

In addition, in light of the serious concerns raised in our meeting regarding the integrity of the below ground fuel piping and system connectivity with older equipment, NMED also requires that KAFB submit a plan to perform a comprehensive subsurface facility fuel system utility inventory, integrity evaluation and system tightness testing. The plan should include use of industry best management practices. This work plan shall be submitted to NMED by August 15, 2008. This required element will be considered an additional Modified Stage 2 AP submittal required pursuant to WQCC § 20.6.2.4106.D.8 for the purpose of assuring that fuel discharges to the environment have been fully stopped.

In regards to the Honeywell site, due to the mixed-waste nature of contaminants potentially discharged, the NMED Hazardous Waste Bureau has jurisdiction over regulatory compliance for this matter. You must contact James Bearzi, Chief, of the NMED Hazardous Waste Bureau at (505) 476-6000 to proceed with the investigation discussed in our meeting.

NMED looks forward to your cooperation in this matter. If you have any questions, please contact me at (505) 827-2919 or Project Manager Baird Swanson at (505) 222-9520.

Sincerely,



William C. Olson, Chief,
NMED Ground Water Quality Bureau

Cc: Alex Mora, City of Albuquerque Environmental Health
P.O. Box 129, Albuquerque, NM
James Bearzi, NMED Hazardous Waste Bureau
Baird Swanson, NMED District 1
Janet Brooks, NMED Team Lead
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