



OVERNIGHT DELIVERY



DEPARTMENT OF THE AIR FORCE
377th Civil Engineer Division (AFMC)

14 Aug 08

MEMORANDUM FOR MR. WILLIAM C. OLSON, CHIEF
GROUNDWATER QUALITY BUREAU (GWQB)
NEW MEXICO ENVIRONMENT DEPARTMENT (NMED)
PO BOX 26
SANTA FE, NM 87502

FROM: 377 MSG/CEANR
2050 Wyoming Blvd SE, Suite 116
Kirtland AFB NM 87117-5270

SUBJECT: NMED requirements for submittal of additional elements of the Modified Stage 2 Abatement Plan report for the Bulk Fuels Facility (ST-106), Kirtland AFB (AFB)

1. The Natural Resource Management Branch at Kirtland AFB is providing a response to the subject requirements outlined in your 29 Jul 08 letter to Kirtland AFB. The requirements and responses are as follows:

NMED: "As a result of the meeting, NMED hereby requires that KAFB submit a written workplan for the immediate installation of the proposed five monitor wells for review and approval. This required element will be considered an abbreviated Modified Stage 2 Abatement Plan submittal required pursuant to WQCC 20.6.2.4106.C.7 for the purpose of accommodating KAFB's proposed accelerating drilling schedule, and is due by and is due by 1 Aug 08. NMED will provide written approval and/or comment on this plan."

KAFB: The requested workplan was provided to you and Mr. Baird Swanson of your staff in our 31 Jul 08 meeting held at Kirtland AFB.

- NMED: "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 facility fuels system utility inventory, integrity evaluation and system tightness testing. The plan should include use of industry best management practices. This workplan will be submitted to NMED by August 15, 2008. This required element will be considered an additional Modified Stage 2 Abatement Plan submittal required pursuant to WQCC 20.6.2.4106.D.8 for the purposes of assuring that fuel discharges to the environment have been fully stopped."

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KAFB: Tightness testing results of all of the fuel system infrastructure currently in use at the Bulk Fuels Facility were provided to you and Mr. Swanson in our 31 Jul 08 meeting held at Kirtland AFB. Additionally, the next annual tightness testing of the fuel system infrastructure is scheduled for the fall of 2008. The tightness testing will be conducted by an independent contractor and evaluated in accordance with industry standards. We will forward the results to you upon completion.

As discussed during our meeting, the facility fuel system utility inventory will include the piping beneath the abandoned offloading rack, and the underground portion of the fuel system currently in use, as Mr. Swanson requested in a conversation with Mr. Mark Holmes of my staff on 7 Aug 80. The inventory will investigate both the connectivity of the abandoned offloading rack system to any other fuel related equipment that would have been potential points of release, and any potential release points in the system currently in use.

We are requesting an extension of time until 15 Sept 08 to submit the final plan for the tightness testing and the facility system utility inventory. The request is based on time required to investigate funding availability and to provide a schedule for the required projects..

- NMED: “ In regards to the Honeywell site, due to the mixed-waste nature of contaminants potentially discharge, 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”

KAFB: As discussed in our 31 Jul 08 meeting, the Honeywell site is operated by the Dept of Energy/Sandia Laboratory and not KAFB. As a result, Kirtland AFB does not have responsibility for the site and does not have an investigation planned.

2. Please contact Mark Holmes, at 505 846-9005 if you have any questions or comments on this matter.

Jennifer Dunn for JSPike

John S Pike, YF-02
Chief, Natural Resource Management

cc:

VA Hospital, Mr. Reichter

ABCWUA, Ms. Gastian

COA, Mr. Gallegos

COA, Mr. Howell

NMED GWQB, Mr. Swanson

NMED HWB, Mr. Kieling

377 AMDS/SGPB, Ms Martinez

COA, Mr. Hart

NMED HWB, Mr. McDonald

USEPA-Region 6 (6PD-N), Ms. King

HQ AFMC/A7CVQ, Mr. Fort

AFCEE, Mr. Urrutia

CH2M, Ms. Minchak

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