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Sent: Wednesday, February 1, 2017 4:34 PM
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Subject: Kirtland BFF - Notification of Condensate Release 1FEB17.

Hi John,

Below is notification on a spill we had today while dismantling the CATOX SVE unit here on base. The full extent of the spill has been containerized and samples have been sent to the lab.

Notification of Release pursuant to Section 1.27 of the RCRA Permit: Condensate water containing potentially hazardous constituents released from former soil vapor extraction system during pipe dismantling.

(a) Information concerning release of any hazardous waste or constituents that may cause an endangerment to public drinking water supplies; and

There was no release of hazardous waste or constituents that will cause endangerment to a public drinking water supply.

(b) Any information about a release or discharge of hazardous waste or hazardous constituent or of a fire or explosion which could threaten the environment or human health including:

i. A Description of the noncompliance and its cause:

Approximately 30 gallons of condensate from soil vapor extraction pipe was released onto the ground during dismantling of the system when a cut was made between the wellhead and the pipe. Pipe was incorrectly reported as being empty of condensate with exception of below grade reaches.

ii. The name, address, and telephone number of the owner, operator, and name of responsible official:

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- iii. **The name, address, and telephone number of the facility**
Same as above
- iv. **The period of the occurrence including exact date and time and, if the noncompliance has not been corrected, the anticipated time it is expected to continue**
The release of condensate from the pipe occurred on 1FEB17 at approximately 0915. Release was contained by 0930.
- v. **The name and quantity of materials involved**
Condensate (water vapor and hydrocarbons) from decommissioned soil vapor extraction system; approximately 30 gallons
- vi. **The extent of injuries, if any**
No injuries
- vii. **An assessment of actual or potential hazards to the environment and human health at and outside the Facility, where this is applicable**
No potential hazard to surface water or groundwater. Short-term impact to soil media only and all soil removed and containerized.

After the condensate drainage was contained at the end of the pipe, the outline of the surface spill area on the soil was demarcated with pin flags based on soil saturation observed on the ground surface. The spill area was approximately 16 feet long and between 2-4 feet wide. Three (3) soil samples were collected for analysis within the spill area prior to soil removal. The soil was excavated to a depth of 4" throughout the length of the spill and to a depth of 8" directly under the conveyance line. A total of 4.5 drums of soil were removed and transported to the designated IDW yard in lined 55-gallon drums. Three (3) confirmation soil samples were collected from the bottom of the excavation (following the removal action) at the northern, central, and southern area of spill. In addition, a condensate sample was collected over a mid-point sump after removal of the flange for analysis. All samples will be analyzed for volatile organic compounds with EPA Method 8260B. Additional Corrective Action will be evaluated pending analytical results.
- viii. **The estimated quantity and disposition of recovered material that resulted from the incident; and**
Soil removed generated 4.5, 55-gallon drums of waste soil; current estimate of condensate remaining in pipe is 500-1000 gallons.
- ix. **The steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.**

Condensate will be removed from the pipe on 2FEB17 via vacuum truck and placed in drums for characterization and disposal. No further dismantling will take place until the pipe is free of liquids.

If you have any questions or require additional information, please let us know.

Thanks!
Scott

//SIGNED//

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