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MEMORANDUM

TO: Dave Cobrain, Manager, Permits Management Program

THROUGH: William Moats, Albuquerque Group Manager, Permits Management Program

FROM: William McDonald, Environmental Specialist, Hazardous Waste Bureau
Sid Brandwein, Environmental Specialist, Hazardous Waste Bureau

SUBJECT: **KAFB'S SOIL-VAPOR EXPANSION WORK PLAN PART I:
CANDIDATE WELL IDENTIFICATION AND PILOT TESTING,
OCTOBER 2013, BULK FUELS FACILITY SPILL SOLID WASTE
MANAGEMENT UNITS ST-106 AND SS-111**

DATE: **October 30, 2013**

While the subject work plan does propose to identify certain wells for testing, two major failings of the plan are:

- There is no commitment to actually increase the capacity of the existing treatment system (CATOX) for the soil-vapor extraction (SVE) system. Since the system presently needs a large amount of dilution air to reduce hydrocarbon concentrations to operational levels, any hookup of additional wells before adding additional treatment capacity will not increase hydrocarbon removal from the vadose zone.
- These wells were chosen because they are existing wells, instead of optimizing locations via improved site characterization efforts and constructing purpose-built SVE wells. In other words, KAFB is choosing the quickest and cheapest alternative instead of doing it based on the best approach. Although they would cost more, in the long run, purpose-built wells installed at optimum locations would increase remediation effectiveness.

It should also be noted that the current SVE treatment system is not running anywhere near its design capacity, and thus, an analysis of why the current system is not running at full capacity

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should be conducted, and the system adjusted or repaired accordingly to increase treatment capacity.

The bottom line is that HWB staff is disappointed with the expansion plan as proposed.