DEPARTMENT OF THE AIR FORCE
377TH AIR BASE WING (AFGSC)

Colonel Eric H. Froehlich
377 ABW/CC
2000 Wyoming Blvd SE
Kirtland AFB NM 87117-5600

Ms. Michelle Hunter, Chief
Groundwater Quality Bureau
New Mexico Environment Department
1190 Saint Francis Drive
PO Box 5469
Santa Fe, NM 87502

Dear Ms. Hunter

Per Discharge Permit DP-1770, Kirtland Air Force Base Bulk Fuels Facility Ethylene Dibromide Remediation, §IV(C) (17), Contingency Plan, Kirtland Air Force Base (AFB) must submit written notification to NMED within one week following discovery of an unauthorized discharge. This letter provides the required one week written notification documenting the unauthorized discharge that occurred between 1600 on November 12 and 0900 November 13, 2015.

The required information follows:

a) Facility Owner: Eric H. Froehlich, Colonel, USAF
377 ABW/CC
2000 Wyoming Blvd SE
Kirtland AFB NM 87117-5600

Facility Operator: Mike Amdurer, Project Manager;
Jason Tarbert, Task Manager; and
Kellie Russell and Jared Stoffel, Operators
CB&I Inc.
2400 Louisiana Blvd NE
Albuquerque, NM 87110
Phone: (505) 262-8800

b) Facility:
BFF Mid-Plume Temporary Groundwater Treatment Facility (TTS), Kirtland Air Force Base, NM.

c) Unauthorized discharge specifics:
The unauthorized discharge occurred overnight between Thursday November 12, 2015 and Friday November 13, 2015 and was discovered at approximately 0900 on Friday November 13, 2015. The discharge occurred at the TTS, which is on Kirtland Air Force Base in the Zia Park area, east of Louisiana and north of Ridgecrest. The duration of the discharge was less than or equal to 17 hours, in that it occurred at some point between the last inspection at 1600 November 12 and the first inspection at 0900 November 13, 2015.

d) Source and cause of unauthorized discharge:

A hose from a sump pump used to pump rainwater from the secondary containment into influent tanks for treatment prior to discharge was left in an influent tank overnight. This tank contained untreated groundwater from extraction well KAFB-106228. The untreated water siphoned back through the hose and sump pump into the secondary containment. Some untreated water then leaked through a dime sized hole in the secondary containment liner and infiltrated into the surface soil. The water flowed along a previous drainage path northward, to a point outside of the TTS fencing, within the Zia Park, on base.

e) Description and composition of the unauthorized discharge:

Untreated groundwater from extraction well KAFB-106228 was released from the TTS secondary containment. The most recent chemical analysis of the untreated water, from a sample collected on October 15, 2015, showed an EDB level of 0.078 µg/L. All other reportable contaminants (benzene, iron, manganese, toluene and total xylenes) were non-detect. The following samples were collected on November 13, 2015 to test for EDB: 1) water in the tank that was the source of the release; 2) two surface soil samples from within the discharge area footprint, and 3) two confirmation soil samples from the potentially-contaminated soil excavation site.

f) Volume of unauthorized discharge:

An estimated 50 to 200 gallons of untreated groundwater was discharged from the secondary containment.

g) Actions taken to mitigate damage:

The following actions took place on November 13, 2015: 1) All water remaining in the secondary containment was immediately pumped back into an influent tank, 2) the secondary containment was discharged, 3) the exterior boundary of the discharge area was identified and flagged, 4) two surface soil samples were collected from the discharge area footprint, 5) the moist soil within the discharge area footprint was excavated, 6) two confirmation samples were collected from the bottom of the excavation site, 7) the excavated soil was containerized in a roll-off bin, 8) the open excavation and roll-off bin were covered with plastic for weather protection, 9) an influent tank water sample was drawn to validate the concentration of groundwater EDB discharged into the secondary containment, and 10) All samples were sent to the laboratory for analysis.

A follow-on extension request for submission of the unauthorized discharge written report will be filed with both your Bureau and the Hazardous Waste Bureau to coordinate a single report submission compliant with the terms and conditions of both the DP-1770 and Kirtland AFB Hazardous Waste Treatment Facility Operating Permit. If you have questions or concerns about the information provided above, please contact Mr. Wayne Bitner at 505-853-3484 or at ludie.bitner@us.af.mil or Ms. Victoria Branson at 505-846-6362 or at victoria.branson@us.af.mil.

Sincerely

ERIC H. FROEHLICH, Colonel, USAF
Commander

cc:
John Kieling, Bureau Chief, Hazardous Waste Bureau, NMED
Kathryn Roberts, Director Resource Protection Division