

Bruce Thomson, Chair
Albuquerque Bernalillo County Water Quality Protection Advisory Board
ABCWUA
P.O. Box 1293
Albuquerque, NM 87103
June 15, 2007

John Kieling, Program Manager
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505

e-mail: john.kieling@state.nm.us

Reference: Draft Hazardous Waste Permit for Kirtland Air Force Base

Dear Mr. Kieling:

I am the current Chair of the Albuquerque and Bernalillo County Water Quality Protection Advisory Board (WQPAB), a volunteer board made up of citizens appointed by the City of Albuquerque, Bernalillo County, and the Albuquerque-Bernalillo County Water Utility Authority (ABC WUA). Our Board is charged with providing review and comment on issues associated with protection of surface and ground water quality in Albuquerque and Bernalillo County.

The WQPAB understands that the NMED is proposing to issue a draft RCRA Facility Operating Permit to the Kirtland Air Force Base. The draft permit contains a requirement that the sanitary sewer line that passes through KAFB landfill LF-002 shall be removed (section 5.2.4, pg. 90). The WQPAB has received two presentations from ABC WUA staff supporting their position that they do not believe this sewer line should be removed because it presents little threat to underlying ground water resources. Briefly, their arguments are that:

- The line was well engineered and well constructed, and was built using materials that have a very long service life.
- The line has been inspected twice in recent years and has been found to be in excellent condition.
- Excavating and relocating the line would introduce greater risk of contamination as a result of the construction process than leaving it in place.
- Relocating the line would be very costly and would limit the utility's ability to address other lines that pose a much greater threat to the environment.

This position is based both on an evaluation by utility staff and on an independent analysis by a very experienced consulting firm. At its meetings, the Water Quality Protection Advisory Board has expressed a desire to hear NMED's response to the utility's findings.

The Board recognizes that the comment period for this draft permit ends today, June 15. However, before we take a formal position on the issue of the sewer line, we would like to know NMED's justification for the requirement. Accordingly, we make the following two requests:

1. That the comment period for this section be extended to the end of August, 2007.
2. That NMED respond to the Utility's concerns and present this information to our Board. To this end, we would like to invite you to meet with us at either our July or August meetings to give us your response.

Thank you for considering our request. Please contact me if you have any questions.

Sincerely,

(Original Signed by Bruce Thomson)

Bruce M. Thomson, Chair
Albuquerque Bernalillo County Water Quality Protection Advisory Board