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John Kieling, Project Manager
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Reference: KAFB Draft RCRA Permit

Dear Mr. Kieling:

Although I am Chair of the Albuquerque Bernalillo County Water Quality Protection Advisory Board, this letter is being sent to express my personal views regarding requirement 5.2.4 of the Draft RCRA Permit to Kirtland Air Force Base. This section of the draft permit requires that the Tijeras Interceptor, the sanitary sewer line through LF-002, be removed.

I generally agree with the NMED's position that over a time period measured in decades or longer this line may pose a threat to underlying ground water resources. However, I do not believe that the risk of leaving the line in place for the next five to 10 years is sufficient to justify a requirement that it be removed immediately. Further, I think the Utility and KAFB should be allowed to explore options in which the line is abandoned instead of removed as abandonment may be a much more cost effective alternative to removal and yet done properly, can provide the same level of environmental protection.

Therefore, while I support the requirement to remove or safely abandon the line, because of the method of construction, the materials used, and the current condition of the line as reported to the Board, I encourage the NMED to modify section 5.2.4 of the Draft Permit to allow the Department to work with the Utility and KAFB to develop a generous implementation schedule that allows exploration of alternative alignments and strategies for the sewer line, and allows these entities to program funding for the project into future budgets.

I do not have a specific recommendation as to when the line should be removed or abandoned, but suggest that this might be a product of the risk analysis recommended by the Water Quality Protection Advisory Board. Regardless of this analysis, I do believe it is reasonable to expect that the line be removed or abandoned before the RCRA permit expires or within 10 years, whichever comes first.

Thank you for considering my views.

Sincerely,

Bruce M. Thomson, Ph.D. P.E.
Environmental Engineer