

Bruce Thomson, Chair
Albuquerque Bernalillo County Water Quality Protection Advisory Board
ABCWUA
P.O. Box 1293
Albuquerque, NM 87103
July 19, 2007

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:

At its meeting on Thursday July 12, the Albuquerque Bernalillo County Water Quality Protection Advisory Board received information from the NMED Hazardous Waste Bureau and the Albuquerque Bernalillo County Water Utility Authority regarding the Draft RCRA Permit for Kirtland Air Force Base. The discussion was focused on paragraph 5.2.4 of the draft permit which requires the Tijeras Interceptor be moved from within KAFB LF-002. The Board received information and discussed this issue at its May and June meetings as well.

The Board unanimously passed a motion made by member Leanne Leith with the following recommendations:

1. The Board supports the requirement that the Tijeras Interceptor through KAFB landfill LF-002 be removed or abandoned in place consistent with the protection of ground water resources underneath this site.
2. The Board recommends that the NMED, KAFB and ABC WUA work together to develop an implementation plan and schedule for removal or abandonment of this line. The implementation schedule should take into consideration the Utility's position that the sewer line does not pose an imminent threat to human health or the environment at the present time. This implementation plan should include a risk analysis to estimate the risk posed by leaving the line in place until it is removed or abandoned, and estimating the risk to human health and the environment of alternative strategies for conveying sewage past LF-002.
3. The Board recommends that the NMED, KAFB, and ABC WUA work together to develop a monitoring program to detect leaks in the sewer line in a timely manner until the line is removed or abandoned.

The Board is very appreciative of your willingness to meet with us and for considering our comments. We look forward to working with you in the future. Please let us know if you have any questions.

Sincerely,

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

cc James Bearzi, NMED
Roy Robinson ,ABC WUA
Douglas Dailey, ABC WUA