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HAND DELIVERED

July 20, 2000

Harry Davidson
Acting Chief, Restoration Branch
Environmental Management Division
377 ABW/EM
2050 Wyoming Blvd SE
Building 20685, Suite 125
Kirtland Air Force Base, New Mexico 87117-5270

RE: Additional Requirements for Stage 1 Abatement Plan, ST-106, Bulk Fuels Facility, Kirtland Air Force Base, New Mexico

Dear Mr. Davidson:

This letter references the investigation of discharges of up to 97,600 gallons of JP-8 jet fuel at the Kirtland Air Force Base (KAFB) Bulk Fuels Facility, as described in Stage 1 abatement plan proposal, AP-28, the conditional approval of that abatement plan by the Ground Water Quality Bureau (GWQB) of the New Mexico Environment Department, dated July 11, 2000, as well as two letters from KAFB to GWQB dated May 19, 2000, and July 13, 2000, regarding the subject abatement plan proposal.

In the letter from GWQB to KAFB that conditionally approved abatement plan proposal AP-28, general and case-specific abatement plan requirements were defined, as well as six additional conditions for approval. The six conditions were defined as follows:

1. All abatement plan documents submitted to NMED must include the originally reported estimate of 97,171 gallons of JP-8 jet fuel from pipeline #22 until an actual determination is made of the amount discharged from the pipeline. The reason for this condition is to comply with 20 NMAC 6.2.4106.C.1.
2. KAFB verbally reported to GWQB that additional pipelines between the pump house and the aboveground JP-8 storage tanks were hydrostatically tested and passed their tests. Therefore, these lines are not part of the investigation area for the missing 97,171 gallons of JP-8.

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Written copies of these line test results should be provided to GWQB as part of the abatement plan. The reason for this condition is to provide justification for not including this area in the investigation.

3. KAFB must determine the full vertical and horizontal extents of the JP-8 discharges reported in November 1999. Especially in the area of pipelines #22 and #23, sampling only along the pipeline may not be sufficient to define the full 3-D extent of the contamination. The reason for this condition is to comply with 20 NMAC 6.2.4106.C.2.a.
4. If additional investigation of ground-water contamination is necessary, a proposal for that investigation must be submitted to GWQB as part of abatement plan AP-28. The reason for this condition is to comply with 20 NMAC 6.2.4106.C.
5. Page 2-5 of the abatement plan proposal describes excavation of 76 cubic yards of soil that were disposed of off-site. The following information about the soil removal activities must be provided to GWQB: the location of the excavation area; analytical results from any confirmatory samples or field measurements collected from the excavated materials or the bottom or sides of the excavation; and information about the offsite disposal, including the dates of the soil removal and disposal, the name of the facility that accepted the soil, the location of that facility, and all manifests that accompanied the transfer of soil. The reason for this condition is to comply with 20 NMAC 6.2.4112.
6. KAFB should provide copies of all documents related to abatement plan AP-28 to the Hazardous Waste Bureau (HWB).

KAFB responded to five of these six conditions in the two letters sent to GWQB:

Condition 1. KAFB submitted an addendum to the Stage 1 abatement plan stating that the amount of fuel released due to failure of pipeline #22 is "unknown," but "fuel inventory records indicate a loss of approximately 97,171 gallons over the past 12 months."

Condition 2. KAFB submitted copies of records of the 150 percent hydrostatic line tests performed at the Bulk Fuels Facility. These records are for two JP-8 product lines from the pumphouse (Building 1033) to the two aboveground storage tanks (Tanks 22 and 23) and the two lines from the pumphouse (Building 1033) to the JP-8 product fillstands (4, 5, 6, and 7). These records were submitted to provide justification for not including these areas in the investigation.

Condition 3. KAFB submitted an addendum to the Stage 1 abatement plan that provides

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additional information about the plan to investigate the horizontal extent of contamination. KAFB must determine the full vertical and horizontal extents of the jet fuel discharges reported in November 1999.

Condition 4. To be met at a later date.

Condition 5. GWQB requested copies of records related to the excavation and removal of 76 cubic yards of soil in November 1999. KAFB responded that the requested information was submitted in Appendix A of the 15-Day Notification of Discharge to NMED, dated December 16, 1999. GWQB does not have a copy of this letter in the case file. Please send another copy of this letter to Jennifer Parker or Jim Mullany at GWQB.

Condition 6. KAFB stated that all documentation related to the abatement plan has been or will be sent to the HWB.

ADDITIONAL REQUIREMENT

On July 19 and 20, 2000, KAFB provided verbal reports to GWQB of progress of the investigation. Based on the report of PID readings in the thousands of ppmv at a depth of approximately 200 feet in the first borehole, GWQB hereby requests that KAFB research fuel inventory records for the Bulk Fuels Facility for the entire time that the facility has been in existence, tracing the records through the time when JP-4 was the jet fuel used at KAFB. Please report whether there are any inventory discrepancies that could indicate losses of any of the fuels stored or transferred at the Bulk Fuels Facility.

If you have any questions, please contact Jennifer Parker or Jim Mullany of my staff at (505) 827-0523 and (505) 827-0212, respectively.

Sincerely,



Dennis McQuillan
Remediation Manager

cc: Roland Rocha, NMED/HWB
Tito Madrid, NMED District 1 Acting Manager
Jennifer Parker, Project Manager, GWQB
Jim Mullany, Project Manager, GWQB

