CITY OF ALBUQUERQUE

Albuquerque Environmental Health Department Mary Lou Leonard, Director



August 31, 2012

Sent Certified Mail 7010 3090 0001 4395 8657 RETURN RECEIPT REQUESTED

Colonel John C. Kubinec USAF Commander U. S. Air Force - Kirtland Air Force Base 377 ABW/CEC 2000 Wyoming Blvd. SE Kirtland AFB, New Mexico 87117-5662

SENT VIA E-MAIL TO: Melissa.Clark@kirtland.af.mil

Re: Emergency Permit #3036-EP for Kirtland Air Force Base

Colonel Kubinec:

PO Box 1293

Albuquerque

NM 87103

www.cabq.gov

The City of Albuquerque, Environmental Health Department (Department), Air Quality Division (Division) received a letter on May 3, 2012 requesting an Emergency Permit pursuant to 20.11.41.22 NMAC for a soil vapor extraction (SVE) system with a thermal oxidizer (TO) to be located at Kirtland Air Force Base (KAFB) in Albuquerque, NM. Air dispersion modeling was completed for the proposed SVE/TO system and was received by the Division on July 20, 2012. The Emergency Permit is needed to remediate fuel contamination from two new SVE wells at the Bulk Fuels Facility spill project site. The two new SVE wells are KAFB-106160 and KAFB-106161 and their locations are shown on Figure 1 (attached). Figure 2 (attached) shows the well construction diagram. It is expected the new SVE/TO system will be running in late fall of 2012.

According to Shaw Environmental, Inc. (Shaw), the company providing remediation services for the SVE/TO system, the two new SVE wells KAFB-106160 and KAFB-106161 were installed in March 2012 as part of implementation of the SVE interim measures discussed during the November 3, 2011 Tiger Team meeting. The Tiger Team meeting was attended by representatives from Shaw, KAFB, the Department, the US Army Corps of Engineers and the New Mexico Environment Department (NMED). The spacing of the wells was based on third quarter 2011 vapor results from two existing wells, along with a preliminary understanding of the radius of influence for SVE units screened in the vadose zone. Vapors collected from the two wells will be routed to the proposed single SVE system through piping with a TO fired by natural gas.

The Emergency Permit is being requested based on the following reasons:

- 1. Currently Shaw is evaluating the costs and benefits of installing and operating available SVE and TO technologies. Once the evaluation is complete and the design is finalized, Shaw wants to be able to commence construction and then operation immediately in order to expedite remediation.
- 2. Expedition of remediation is necessary to reduce the threat to receptors in the area.

The Department has reviewed the modeling analysis and has determined that the SVE/TO system will not contribute to exceedance of any NAAQS or NMAAQS standard. The Department has also evaluated the current situation at KAFB and has determined that an Emergency Permit will be issued pursuant to 20.11.41.22 NMAC. This letter shall serve as the new Emergency Permit and has been issued to KAFB for the construction and operation of a SVE/TO system on their base according to information in the letter received by the Division on May 3, 2012.

KAFB shall submit a full permit application within 45 days following NMED approval of the final SVE design plan. This approval is estimated to occur no later than November 12, 2012, but KAFB will keep the Department notified of any changes to this approval date.

KAFB shall notify the Division by fax or writing within twenty-four hours of initiating the startup of the SVE/TO system.

If you have any further questions, please do not hesitate to contact Regan Eyerman at (505) 767-5625 or Isreal Tavarez at (505) 768-1965.

Sincerely,

Mary Lou Leonard

Director

Environmental Health Department

City of Albuquerque

xc: File

Patrick Montano, Chief of Natural Resources Management and Compliance, KAFB Bill Westmoreland, Deputy Director, Environmental Health Department Isreal Tavarez, Environmental Health Manager, COA/EHD/AQD William Gallegos, Environmental Health Manager, COA/EHD/ESD Dario Rocha, Supervisor, Permitting and Technical Analysis Section, COA/EHD/AQD Damon Reyes, Supervisor, Field Operations Section, COA/EHD/AQD Matt Stebleton, Supervisor, Compliance Section, COA/EHD/AQD Regan Eyerman, Environmental Health Scientist, COA/EHD/AQD



