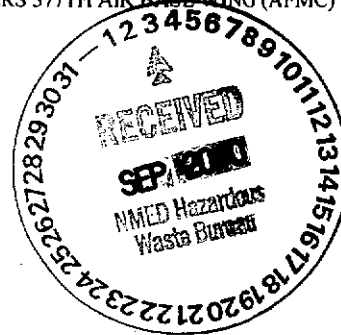




DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 377TH AIR BASE WING (AFMC)



SEP 02 2010

Colonel Robert L. Maness
377 ABW/CC
2000 Wyoming Blvd SE
Kirtland AFB NM 87117-5000

Mr. James Bearzi
Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505

Dear Mr. Bearzi

We are in receipt of August 6, 2010 Notice of Disapproval of the draft work plans submitted by Kirtland AFB for cleanup of the fuel release at the Bulk Fuels Storage Facility on base and contamination of the aquifer below. The Air Force and Kirtland AFB would like to restate our deepest concerns for immediately arresting the plume and initiating final cleanup in the most efficient and expeditious manner possible. I am steadfast in my commitment for the Air Force's proposed path forward using a performance based contract with mutually defined performance goals to ensure the protection of the base and community drinking water supply.

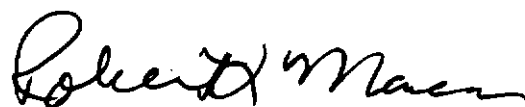
In response to this commitment, the Air Force is working to provide information and perform some of the work requested in your 6 August 2010 letter. (See Atch 1). Further, we are working on redrafting the three previously submitted work plans to incorporate performance-based concepts that will provide the information necessary for both our agencies to make sound decisions on how best to remediate the fuel plume. In order to ensure the redrafting of the work plans meet the requirements of all parties involved, we are requesting a sixty (60) day extension for the submission of the work plans, in that the performance based contract will not be awarded until 30 September 2010. We do expect the revised work plans will deviate from the prescriptive direction in NMED's letter, however, the Air Force is confident that such an allowance will ensure the cleanup is completed in the most expeditious and efficient manner possible.

We are also requesting a sixty (60) day extension for submitting the Critical Well Data information and a one hundred twenty (120) day extension for completing the SVE requirements (See Atch 2). The installation wells have not previously been sampled for the additional constituents your office has requested, resulting in our having to resample the wells for those additional constituents on our existing quarterly sampling schedule. That schedule, along with the time required to receive the sampling analyses from the laboratory, prevents the installation from meeting the 7 September 2010 deadline. As for the SVE spare parts and spare engine inventory, the Albuquerque Environment Health Department/Air Quality Division has just approved the SVE New Source Performance Standards (NSPS) test protocol. The testing of each of the four SVE units will begin on 7 September 2010, with an anticipated completion date of 12 September 2010, and receipt of the test data results should occur no later than 12 October 2010. The results of the testing will determine if the SVE units have met the NSPS standards and are eligible for continued operation. If the SVE units fail the NSPS standards, they cannot be incorporated into the remediation effort and another SVE technology will have to be considered, thereby eliminating the need

for the spare parts or spare engines. In the alternative, if the SVE units pass the NSPS standards, SVE spare parts and engines will be identified and purchased. New engine purchases have an estimated forty-five (45) day delivery upon order, pending manufacturer's existing orders and supplies.

If you or your staff have any questions regarding this matter, please have them contact Mr. Thomas Berardinelli (505-853-5319).

Sincerely



ROBERT.L MANESS, Colonel, USAF
Commander

cc:

Secretary Ron Curry, New Mexico Environment Department

Attachments:

1. KAFB Achievable Items to 6 August 2010 NMED Ltr
2. KAFB Requested Extended Timeline Items to 6 August 2010 NMED Ltr

Items from 6 Aug 10 (Table 5) that can be submitted to NMED by the deadline

Activity Description	NMED Deadline	KAFB Response/Comments
Other document Submittals		
Indoor Air Quality Report	6-Oct-10	Achievable. There is draft report awaiting finalization
Interim Measures and Other Actions		
Operate SVE units at Fuel Offloading Rack and KAFB-1065, KAFB-1066, and KAFB-1068	Immediately, except as noted in NMED letter	Concur
Begin excavation of contaminated soil and removal of remaining components of the Fuel Offloading Rack	6-Oct-10	Achievable. Current DLA demolition contract was modified and funded to remove abandoned piping required in NMED letter. Removal of contaminated soil to 20' depth will be removed by PBC contractor
Complete excavation of contaminated soil and removing remaining components of the Fuel Offloading Rack	6-Oct-11	Achievable. Current DLA demolition contract was modified and funded to remove abandoned piping required in NMED letter. Removal of contaminated soil to 20' depth will be removed by PBC contractor
Report on completion of excavation of contaminated soil and removing remaining components of the Fuel Offloading Rack.	15-Jan-12	Achievable
Submit estimate of contaminant migration rate to NMED	7-Sep-10	Achievable. AFCEE/TD will generate the calculations and send to KAFB for delivery to NMED
Complete A, B, and C sentry wells at location #28	8 Nov 2010 or 90 days after required access is granted, whichever is later.	Achievable, 90 days after required access is granted
Complete B and C sentry wells at KAFB-10613 and KAFB-1064		Achievable, 90 days after required access is granted
Complete A, B, and C sentry wells at location #3		Achievable, 90 days after required access is granted
Complete A, B, and C sentry wells at location #1		Achievable, 90 days after required access is granted
Complete geologic logs of new wells at locations #1, 3, 28, KAFB-10613 and KAFB-1064.		During drilling of each well.
Complete geophysical logs of new wells at locations #1, 3, 28, KAFB-10613 and KAFB-1064.	Within 30 days of well completion.	Achievable
Submit copies of geologic and geophysical logs for locations #1, 3, 28, KAFB-10613 and KAFB-1064.	In accordance with NMED letter of June 4, 2010	Achievable
Notification of sampling and other field activities (Section B.1. of Part 2)	No less than 15 days prior to implementation.	Achievable
Submit geologic and geophysical logs for sentry wells	In accordance with NMED letter of June 4, 2010	Achievable
Submit water quality data for WUA wells	In accordance with NMED letter of June 4, 2010	Achievable
Submit well completion reports	In accordance with NMED letter of June 4, 2010	Achievable
Submit report on all SVE units	In accordance with NMED letter of June 4, 2010	Achievable
Report to NMED if any SVE units will not receive an air emissions permit to operate	Immediately	Achievable

Items from 6 Aug 10 (Table 5) that can be submitted to NMED by the deadline

Activity Description	NMED Deadline	KAFB Response/Comments
Report to NMED down time of SVE units that will exceed a duration of 72 hours	Within 24 hours of discovery that repairs or maintenance will take more than 72 hours to complete	Achievable. This has been added to current operating instructions

Items NMED 6 Aug 10 Memo (Table 5) submittal schedule

Activity Description	NMED Deadline	Existing Well Location	New Well Location	Actions Required for Implementation	Estimated Completion (days)	Total (days after notice to proceed)
Install and Operate SVE Units	6-Oct-10	KAFB-3411		Custom construct and deliver to site	90	165
		KAFB-10614		Install and test system	45	
		KAFB-10624		Air Permit approval	30	
Install and Operate SVE Units	8-Nov-10		SB /VM well 4	Drilling, logging, well completion (use 2 rigs)	35	275
			SB/VM well 5			
			SB/VM well 9	New large capacity system design	60	
			SB/VM well 10	NMED approval of design	15	
			SB/VM well 11	Custom construct and deliver to site	90	
			SB/VM well 12	Install and test	45	
			SB/VM well 21	Air Permit approval	30	
Install and Operate SVE Units	6-Oct-10	KAFB-10617		Obtain access for SVE unit installation	90	225
		KAFB-10618		Custom construct and deliver	60	
Install and Operate SVE Units	8-Nov-10	KAFB-10610		Install and test system	45	
				Air Permit approval	30	
prepare for SVE units	8-Nov-10		VM well 3	Obtain access for drilling	90	120
			VM well 8			
			VM well 9	Drilling, logging, well completion	30	
Revised work plans (interim Measure, Vadose Zone, Ground water Investigation)	7-Sep-10	N/A	N/A	Update monitoring wells network, CSM, QAPP, QA/QC plan, work schedules	60	90
Maintain Spare Parts Inventory for SVE Units in Inventory	7-Sep-10	N/A	N/A	Award PBC Contract & Completion of Permit Certification	125	90
Submit Critical Data	7-Sep-10	All	N/A	Award PBC Contract	90	65