



DEPARTMENT OF THE AIR FORCE
WASHINGTON DC

SEP 02 2010

OFFICE OF THE ASSISTANT SECRETARY

SAF/IEE
1665 Air Force Pentagon
Washington DC 20330-1665

Mr. James Bearzi,
New Mexico Environment Department
Harold Runnels Building
1190 Saint Francis Drive (87505)
PO Box 5469 Santa Fe, NM 87502

Dear Mr. Bearzi

We are in receipt of the August 6, 2010 Notice of Disapproval from the Hazardous Waste Branch of the draft workplans submitted by Kirtland AFB for the cleanup of the fuel spill at the bulk fuel storage area on base and contamination of the aquifer. The Air Force, like New Mexico, has equal interest in immediately arresting the plume and beginning cleanup in the most efficient manner possible. The Air Force is steadfast in its commitment that the path, agreed to by Secretary Curry and Assistant Secretary Yonkers, using a performance-based contract with mutually defined performance goals will best achieve results that will ensure the protection of the base and community of Bernalillo County.

To that end, we are making provisions to provide the information and perform some of the work requested in the August 6 letter (Atch 1). Further, we are working on redrafting the workplans to incorporate performance-based concepts that will provide the information our agencies need to make decisions on remedial actions. In order to ensure that these plans are acceptable to both our organizations, we are requesting a delay for those activities and submittals in Attachment 2 of this letter. We anticipate the redrafted plans will deviate from the prescriptive direction in NMED's letter; however, we are confident the performance-based approach will achieve our mutual objectives in the quickest and most efficient manner.

Once these plans are approved by NMED, we expect to enter into a binding agreement with you to ensure appropriate oversight and coordination, and to solidify our commitment to protecting human health and the environment. If your staff has any questions regarding this matter, please have them contact Ms. Michele Indermark, (703)614-8458, of my staff.

Sincerely

TIMOTHY K. BRIDGES, SES
Deputy Assistant Secretary of the Air Force
(Energy, Environment, Safety,
and Occupational Health)

Attachments:

1. Pending Submittals
2. Fieldwork Timelines

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.	Achievable
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	
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