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NEW MEXICO  
ENVIRONMENT DEPARTMENT

*Hazardous Waste Bureau*

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DAVE MARTIN  
Secretary

BUTCH TONGATE  
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 24, 2012

Colonel John Kubinec  
Base Commander  
377 ABW/CC  
2000 Wyoming Blvd. SE  
Kirtland AFB, NM 87117-5606

John Pike  
Director, Environmental Management Services  
377 MSG  
2050 Wyoming Blvd. SE, Suite 116  
Kirtland AFB, NM 87117-5270

**RE: LETTER ADDENDUM OF FEBRUARY 7, 2012 FOR LNAPL CONTAINMENT WELL DEVELOPMENT, LNAPL CONTAINMENT WELL INTERIM MEASURES WORK PLAN PART 1, CHARACTERIZATION, BULK FUELS FACILITY SPILL, SOLID WASTE MANAGEMENT UNITS ST-106 AND SS-111 KIRTLAND AIR FORCE BASE, EPA ID# NM9570024423 HWB-KAFB-10-037**

Dear Col. Kubinec and Mr. Pike:

The New Mexico Environment Department (NMED) is in receipt of the above referenced letter addendum submitted for Kirtland Air Force Base (KAFB)(Permittee) under cover letter from Mr. Thomas Berardinelli to Mr. John Kieling, dated February 7, 2012.

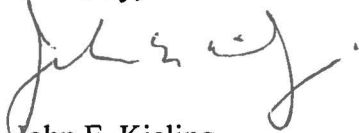
NMED approves the technical aspects of conducting the enhanced well development as described in the subject letter addendum, but understands that groundwater to be removed from the extraction well is expected to contain hazardous waste, specifically benzene at a concentration in excess of 0.5 mg/L. **A hazardous waste permit is required to treat such groundwater before the water can be discharged to the ground or otherwise land disposed.** For the groundwater to no longer contain benzene, the groundwater must be treated such that the benzene concentration is less than 0.5 mg/L. Additionally, all underlying hazardous constituents (UHCs) that may be present in the groundwater must also be treated if necessary to the appropriate treatment standards found in 20.4.1.800 NMAC incorporating 40 CFR § 268.48. For example, organic compounds such as toluene, ethylene dibromide, and xylene should be evaluated to determine if they are

UHCs and if they require treatment.

Although the NMED can issue an emergency permit under 20.4.1.900 incorporating CFR § 270.61 for treatment of hazardous waste as part of conducting the enhanced well development, the Permittee did not request an emergency permit and did not provide the minimum information necessary for the NMED to issue an emergency permit. The letter addendum did not provide information concerning what is to be analyzed, the analytical methods to be employed, the frequency of sampling prior to and after treatment, and the records and certifications that are required to be kept concerning the generation and treatment of characteristic wastes.

Should you have any questions regarding this matter please contact Mr. William Moats of my staff at 505-222-9551.

Sincerely,



John E. Kieling  
Acting Chief  
Hazardous Waste Bureau

cc: W. Moats, NMED HWB  
W. McDonald, NMED HWB  
S. Brandwein, NMED HWB  
J. Schoepner, NMED GWQB  
B. Gallegos, AEHD  
B. Gastian, ABCWUA  
L. King, EPA-Region 6 (6PD-N)  
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