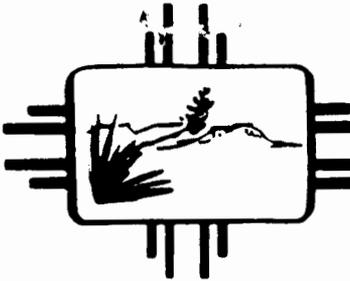


ENTERED

New Mexico Health and Environment Department



GARREY CARRUTHERS
Governor

DENNIS BOYD
Secretary

MICHAEL J. BURKHART
Deputy Secretary

RICHARD MITZELFELT
Director

August 3, 1990

Col. Edward A. Behling, Director
Environmental Management Division
Headquarters 1606 Air Base Wind (MAC)
Kirtland Air Force Base, NM 87117-5000

**RE: August 2, 1990 KAFB/EID Meeting
NM9570024423**

Dear Col. Behling:

It is the policy of the New Mexico Environmental Improvement Division (EID) to provide a summary of the conclusions of all significant meetings between Kirtland Air Force Base (KAFB) and EID. After a review of this summary, if KAFB has any disagreements with the statements in this summary, please contact Dr. Bruce Swanton of my staff at (505) 827-2935. In absence of such communication, EID will consider itself and KAFB to be in agreement as to the conclusions reached at the referenced meeting.

EID's summary of the meeting is enclosed.

Sincerely,

Bill Blankenship, Supervisor
Compliance Evaluation and Inspection
Hazardous and Radiation Waste Bureau

BB/bas

xc: Tracy Hughes, HED Office of General Counsel



EID/KAFB CLOSURE PLAN MEETING
JULY 25, 1990

Attendees: John Gould, KAFB IRP Project Supervisor
Pat Montaña, GCL Master Technician
Mike Silva, GCL Project Manager
Bruce Swanton, EID Hazardous and Radioactive Waste
Bureau

Swanton: The goal of this meeting is to review the Sewage Lagoon and Golf Course Pond closure plans. The first submittal was not complete in that many subjects were not sufficiently detailed within the site specific closure plans. The site specific plans must meet the "Third party test": the plans should be essentially executable by a third party who has no prior knowledge of the facility and who can receive minimal aid from the facility staff. Swanton explained that EID is in the position of a third party when it attempts to review closure plans. The plan should be largely self-explanatory.

He stated that he would limit his comments, and his written summary of them, to those areas with which he had disagreement, or which he found were treated inadequately by the referenced CP.

He stated that at a meeting like this one EID could not be held to binding conclusions arrived at verbally, that any final decisions would be made with the concurrence of the section supervisor.

Gould: EID wrote a letter to KAFB to the effect that the golf course (land treatment area) was no longer considered to be a RCRA unit due to soil chemistry test results, but then EID backed off of this position and now maintains that a regulatorily complete closure plan is required for the golf course area since it has land application site status.

KAFB is awaiting results of both sewage lagoon sludge and underlying soil samples and golf course pond sludge samples. Both are being run for Appendix IX. Five samples have been taken in each lagoon for depth of contamination.

Sewage Lagoon Closure Plan (CP) Review

The CP being considered is the April 13, 1990 draft "Unit Closure Plan for Sewage Lagoons". The section numbers refer to that document. The comments on each section are Swanton's.

- 5.2.1. The sampling procedures must be comprehensive in order to reside in the base-wide plan only. All reasonably foreseeable sampling situations and media must be addressed. Number of samples per unit area and sampling locations for test and background samples must be in the site specific plan.

[Silva stated their currently proposed sampling strategy as follows: Do an Appendix IX scan on the sludge to determine the complete list of existing contaminants, then select indicator parameters from the list. Determine the depth of contamination by sampling for the indicator parameters. Once "clean soil" has been encountered, signified by lack of identifiable indicator parameters, then run an Appendix IX scan on material from that depth to verify. I agreed that this is a reasonable strategy.]

- 6.0 KAFB does not now have adequate data on depth or type of contamination at either the golf course pond or the sewage lagoons. A CP submitted without adequate depth-and type-of-contamination data must address each reasonable contingency; e.g., the amount of contaminated material may be small enough for complete excavation and removal, or clean closure may not be possible. The CP must contain third-party executable programs for both clean-closure and closure in place. The CP must also include quantitative measures which will be used to determine which path the closure will take.

Section 6 of this CP is in general inadequate. This section must include all of the third-party executable level of detail for both closure eventualities.

- 6.3.2 If KAFB submits the CP prior to determination of the maximum inventory (volumes and types) of hazardous wastes to be generated during closure, it must establish draft agreements with licensed disposal agencies which will accept the volume and type of wastes which may be reasonably anticipated to be generated during closure. Such draft agreements must be a part of the CP.

- 6.4 This section addresses health and safety. The base-wide plan must include detailed information regarding each level of protection (A-D) and which will be used under which circumstances. If KAFB submits a CP prior to acquisition of data documenting which level of protection will be used in during the closure process, the CP must address each eventuality and must include plan (overhead) maps (not necessarily to scale) of the unit closure area detailing the locations of security devices, equipment and personnel decontamination areas, decontamination fluid holding units, etc., for each level-of-protection scenario which may be reasonably anticipated.

- 6.6 KAFB must determine whether to increase the level of detail in the basewide CP such that every type of equipment decontamination procedure is specified or to include this information in the site-specific CP's. In any case, the physical facilities for decontamination of equipment which must be constructed in the closure area must be included in the site-specific plan view map described above.
- 7.1.1 If KAFB submits its CP without complete hazardous waste inventory data the CP must detail the procedures which will be used to determine the maximum waste inventory.
- 7.1.2 KAFB must include in the site specific CP the complete inventory of auxiliary equipment (piping, etc.) which is contaminated and must detail the procedures which will be used to make these determinations.
- 7.1.3 The Schedule for Final Closure must include all reasonable contingencies, milestones for making decisions at branch-points, and milestones within each decision outcome scenario for each discrete action during closure. In other words, the Schedule must include milestones for completion of all discrete actions under all foreseeable circumstances. The schedule must be written such that milestone dates are listed in days from the approval of the CP by EID.
- 8.0 It is my opinion that, without an inventory of wastes, and thus without any certainty as to whether clean closure will be possible or closure in place will be required, KAFB must take the conservative position and submit a post-closure care plan as a part of the CP. I do not anticipate that EID will approve a CP without a post-closure care plan unless KAFB can document to a reasonable certainty that post-closure care will not be required.