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Rec'd 8 Jul 91

July 3, 1991

Col. Jack Martinez
Director, Environmental Management
Headquarters 1606 ABW/EM
Kirtland Air Force Base, NM 87117-5000

RE: RESPONSE TO REQUEST FOR ALTERNATE GROUNDWATER MONITORING SYSTEM AT SEWAGE LAGOONS AND GOLF COURSE MAIN POND - NM9570024423

Dear Col. Martinez:

The New Mexico Hazardous and Radioactive Waste Bureau (HRWB) received a letter of request from the Office of Environmental Management at Kirtland Air Force Base (KAFB) on July 2, 1991.

HRWB assumes that there is the possibility of a statistically significant increase in indicator parameters from upgradient wells to downgradient wells at the sewage lagoons, and therefore is allowing, as per 40 CFR §265.90 (d), the alternate ground-water monitoring system requested at that unit.

HRWB also assumes that a downgradient well at the main golf course pond would detect a statistically significant increase of indicator parameters and therefore is allowing, as per 40 CFR §265.90 (d), the alternate ground-water monitoring system requested at that unit.

KAFB has already performed extensive ground-water sampling at both of these locations, and has detected no Appendix IX constituents.

This letter will constitute approval of the requested alternate ground-water monitoring systems at the sewage lagoons and the golf course pond.

Please contact me at (505) 827-2424 if you have any questions.

Sincerely,

Joe Kennedy, Hydrogeology Section
Hazardous and Radioactive Waste Bureau

cc: Tracy Hughes, OGC
Edward Horst, Program Manager
Bruce Swanton, Compliance Supervisor



June 26, 1991

Memo to file from Joe Kennedy

HRWB staff met with representatives from Kirtland Air Force Base (KAFB) on June 25, 1991, in order to discuss requirements for approval of a closure plan for sewage lagoons and the golf course main pond and requirements for approval of an alternative groundwater monitoring system.

Present at the meeting were:

<u>NAME</u>	<u>COMPANY</u>	<u>PHONE</u>
Mike Silva	GCL	842-0001
Lt. Col. George Pratt	KAFB	846-2774
Col. Tom Norris	KAFB	846-2751
Joe Kennedy	HRWB	827-2424
Steve Alexander	HRWB	827-2424
John Gould	KAFB	846-2773
Edward Horst	HRWB	827-2928
Bruce Swanton	HRWB	827-2211

Joe Kennedy opened the meeting by saying that there would not be any decisions made at this meeting. Any decisions to be made would be made through correspondence in writing.

John Gould stated that KAFB wishes to include wording that would say KAFB will cap either unit if they could not clean close. They felt that they did not need to include actual design of such cap. HRWB argued that if a public hearing is called for, there needs to be a commitment greater than just KAFB's word. This should be a committed design and explanation that the public can understand.

Col. Pratt suggested that we divide discussion into three categories:

- 1) Items that are typographical;
- 2) Items to be added to document such as tables;
- 3) Risk Assessment.

Bruce stated that the risk assessment analysis required was nothing new. He sent a copy of his notes shortly after the CME to Mike Silva saying that risk assessment calculations needed to be performed.

Joe stated that QA/QC procedures could be included in the BWCP only. However, site specific situations need to be addressed in the individual unit supplemental closure plans.

In discussing the alternative groundwater monitoring system, we all agreed that the U.S.G.S., "Groundwater Quality Data, Kirtland Air Force Base, New Mexico, November-December 1990" document, along with a letter of proposal, would be adequate as an application for Alternative Groundwater Monitoring Program.

John did not feel that freon was present in the soil beneath the sludge at the sewage lagoons. Joe mentioned that it was stated in Julie Wanslow's notes that freon was confirmed to be present at 230 ppb. Everyone agreed that we need to confirm these results. If freon is indeed present, they will have to sample at depth to determine if there is an increase or decrease in concentration of freon.

KAFB is trying to establish, with the NMED Groundwater Bureau, if the nitrates they have detected are of any concern and who will coordinate their regulation. Mike Space is the NMED Groundwater Bureau contact.

We discussed part 6.1 (c) of HRWB letter review and decided we need to find out if a commitment from a TSDF to take KAFB's sludge or soil is needed in the closure plan.

The meeting concluded with a review of what was needed from HRWB and KAFB.

HRWB

Need to review ITIR and their alternative groundwater monitoring proposal

Check regulations to see what sort of commitment needs to be included in the closure-plan as far as a TSDF receiving KAFB's contaminated sludges or soils

KAFB

Will provide flow chart or decision making processes for decontamination procedure for equipment

Will provide a cover letter proposal for alternative groundwater monitoring system to go with U.S.G.S groundwater quality data submitted 6/25/91

Will add language to closure plan that says TCLP analysis will be run for metals unless documentation is provided by a non-government lab saying it is not necessary to run TCLP since EP Toxicity was already run