



DEPARTMENT OF THE AIR FORCE

HEADQUARTERS 1606TH AIR BASE WING (MAC)  
KIRTLAND AIR FORCE BASE, NEW MEXICO 87117-5000

ENTERED

REPLY TO  
ATTN OF: EM

10 Jul 91

SUBJECT: Minutes of Kirtland Air Force Base (KAFB)/New Mexico Environment  
Department (NMED) Meeting, 25 June 91

TO: Hazardous and Radioactive Waste Bureau (HRWB), NMED (Mr Kennedy)

1. Purpose: We met with NMED officials to clarify technical  
aspects of a Notice of Violation (NOV) issued by NMED on  
13 Jun 91 (Atch 1).

2. Attendees:

Col Tom Norris, 1606th Air Base Wing (ABW)/Environmental  
Management Division (EM), KAFB  
Lt Col George K. Pratt, 1606 ABW/EM, KAFB  
Mr John Gould, 1606 ABW/EM, KAFB  
Mr Mike Silva, Geoscience Consultants Ltd [GCL] (Contract  
Consultant for 1606 ABW/EM, KAFB)  
Mr Edward Horst, Program Manager, HRWB, NMED  
Dr Bruce Swanton, Compliance Supervisor, HRWB, NMED  
Mr Joe Kennedy, Water Resource Specialist, HRWB, NMED  
Mr Steve Alexander, HRWB, NMED

3. Discussion:

a. The meeting began shortly after 1400 with each of the  
attendees introducing himself.

b. Although higher ranking individuals were present,  
Dr Swanton indicated that KAFB should interface with Mr Kennedy  
as the lead NMED official on resolving this NOV.

c. Mr Kennedy stated that this meeting was not a decision  
making forum, but rather an opportunity to clarify any aspects in  
the NOV which were unclear. He highlighted two of NMED's key  
issues included in the NOV:

(1) The inclusion of a contingency plan if clean closure  
is not possible.

(2) Risk assessments will be the determining factor on  
whether any material needs to be removed from the sites.

d. Lt Col Pratt stated that KAFB's review had divided NOV  
discrepancies into 3 general areas: (1) typographical and/or  
stylistic errors; (2) additional documents or data to be incorpo-  
rated into the base-wide closure plan; and (3) technical issues.



The third category was noted to include the risk assessments, the contingency plan, and the additional tabulation of data.

e. The group then conducted an item by item review of the NOV starting with the "Base-wide Closure Plan" and reached the following clarifications:

(1) Section 5.2.2: The US Geological Survey (USGS) quality control (QC) procedures will be incorporated into the base-wide closure plan.

(2) Section 5.2.4: The QA/QC outline from Chapter 1 of SW 846 will be added to the base-wide closure plan.

(3) Section 5.2.7: (a) Lt Col Pratt and Mr Gould stated that KAFB would include a commitment to groundwater monitoring pursuant to 40 CFR Part 265.90 through 265.93, but noted this may be done via an alternate groundwater monitoring system described in a recently submitted USGS report.

(b) Dr Swanton stated that a formal request must be submitted to NMED for approval of this specific alternate groundwater monitoring system at the sewage lagoons and the golf course pond.

(c) Dr Swanton stated that NMED was placing considerable emphasis on ensuring completeness of these KAFB closure plans since a public hearing would have to be conducted if requested. Lt Col Pratt inquired into the number of "closure plan" related public hearings conducted by NMED in the past and Dr Swanton could not recall any, briefly confusing the Los Alamos RCRA Part B permit public hearing with a closure plan hearing.

(4) Section 6.2.2: (a) Correction of a typographical error is required to correct the full description for TCLP.

(b) Dr Swanton noted that he had discussed the requirement for performing risk assessments (RA's) in a previous meeting with Mr Gould and Mr Silva. He suggested that GCL could perform this in less than a day using spreadsheet software. NOTE: Mr Gould later stated that his recollection of that conversation was that an eventual requirement existed for preparing RA's, but that they did not have to be included in the closure plans. Mr Silva later stated that even with software, Dr Swanton's estimate was very optimistic.

(c) Dr Swanton stated the source for his risk assessment requirement was the Superfund Public Health Manual.

(5) Sections 8.2 & 8.3: Same issue as discussed for Sect. 5.2.7 above.

(6) Appendix F: addresses a typographical error.

f. The following comments were made, and clarifications reached, on the "Unit Closure Plan for the Golf Course":

(1) Sections 5.2.2, 5.2.8, 5.4: Same issue as discussed in similar sections of the "Base-wide Closure Plan."

(2) Appendix A: the risk assessment requirement was reiterated and a requirement to add a description of Enseco's standards, etc in the base-wide closure plan.

(3) Section 5.3.4: Mr Gould noted that the missing letter referenced to be found in Appendix D, was actually included in the plans, but at the end of Appendix A.

(4) Section 6.1: (a) The need to specify if any contaminants are present above the TCLP level in 40 CFR Part 261.24 was discussed; and (b) obtaining verification that a treatment storage or disposal facility could receive any hazardous waste removed from KAFB closure sites.

(5) Lt Col Pratt asked if one could assume that a contingency plan would not be required if the alternate groundwater monitoring system was approved. Dr Swanton and Mr Kennedy after some consideration said yes, though noting that the system in being had not yet been approved.

(6) Mr Gould stated that a contingency plan had not been included in the Nov 90 set of closure plans due to KAFB's intent to clean close the sites. Dr Swanton countered that some citizens might inquire about what type of contingency plan would be used if closure in place was required and that some discussion would be required to adequately address this issue.

(7) Section 7.1.2: KAFB needs to explain how a decision would be determined if decontamination of the piping between the sewage lagoons and golf course pond is required. A flowchart decision tree was deemed acceptable.

(8) Appendix A: Further data compilation must be performed to meet NMED requirements. NOTE: A follow-up meeting may be warranted with NMED due to differing interpretations between GCL and us on the extent of data tabulation involved.

g. The following comments were made, and clarifications reached, on the "Unit Closure Plan for the Sewage Lagoons":

(1) Section 2.2.7: Issue previously addressed.

(2) Section 6.1: (a) Discussion fluctuated on how much detail would be required dependent on the following variables: (a) approval of the alternate groundwater monitoring system; (b) level of contaminants detected. It was again agreed that if the alternate groundwater monitoring system is approved, then a contingency plan would not be required. Depending on the level of contamination found NMED comments varied on the amount of detail required. This is an issue to research carefully before preparing the KAFB response.

(b) The level and location of the 1,1,2-trichloro-1,2,2-trifluoroethane (a Freon) was agreed to be critical. If it is at a trace level in the sludge, the need for a contingency plan was deemed unnecessary. If it was found in the soil below the sludge, then a contingency plan was deemed necessary by NMED officials.

(3) Section 6.6: a self-explanatory typographical error.

(4) Appendix A: Table 4 contains a self-explanatory numerical error.

4. Summary:

a. Kirtland Air Force Base:

(1) Submit letter formally requesting approval of the alternate groundwater monitoring program. NOTE: This was accomplished via a 28 Jun 91 EM letter (Atch 2).

(2) Submit by 16 Jul 91 (30 days from receipt) the KAFB response to the NOV.

(3) Verify ability to fund the clean closure cost.

(4) Investigate with a civilian laboratory the ability to convert EPTox data to TCLP equivalent.

b. NMED:

(1) Review ITIR for freon location (e.g. - present in soil versus sludge).

(2) Review USGS data supporting alternate groundwater monitoring system.

(3) Provide a response to KAFB's pending request for approval of this system by 5 Jul 91 (Atch 3).

(4) Determine what information, if any, is required from a disposal facility indicating its ability to receive any hazardous waste removed from the sewage lagoon, golf course pond, or golf course at Kirtland AFB.

5. The meeting adjourned at approximately 1600.



GEORGE K. PRATT, Lt Col, USAF, BSC  
Deputy Director  
Environmental Management Division

3 Atchs  
1. NMED Ltr, 13 Jun 91  
2. 1606 ABW/EM Ltr, 28 Jun 91  
3. NMED Ltr, 3 Jul 91