



BRUCE KING
GOVERNOR

ENVIRONMENTAL DEPARTMENT
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JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

December 31, 1991

Col. Thomas A. Norris
Director, Environmental Management
Headquarters 1606 ABW/EM
Kirtland Air Force Base, NM 87117-5000

**RE: NOTICE OF INADEQUATE CLOSURE PLAN FOR BATTERY SHOP FRENCH
DRAIN**

Dear Colonel Norris:

It has come to the attention of the New Mexico Environment Department (NMED) that Kirtland Air Force Base (KAFB) has already performed the closure work at the Battery Shop French Drain located at KAFB. Our assessment of the site (based on data from the KAFB Closure Plan) leads us to believe that a closure performed according to the Closure Plan submitted would be inadequate and therefore not approvable. The NMED believes there has been contamination of the soil by organic solvents in the area of the drain. The NMED requires that KAFB perform the following task:

- 1) Submit a plan to assess the vertical and horizontal extent of solvent contamination in the area. The current data is too sparse and cannot give definitive information as to the location of the highest amount of contamination. A soil gas survey covering an area 200 feet from the drain in all directions should be utilized to help guide the drilling of boreholes for the assessment. This plan should include additional borehole locations which will be drilled to the water table or to 10 feet below the deepest sample that shows contamination above method detection limit (MDL), whichever is encountered first. MDL is defined here as the estimated concentration at which the signal generated by a known constituent is three standard deviations above the signal generated by a blank, and represents the 99% confidence level that the constituent does exist in the sample.
- 2) Revise the closure plan to be a Unit Closure Plan compatible with the Basewide Closure Plan and similar to

KAFB1189



Colonel Norris
December 18, 1991
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the Unit Closure Plans submitted for the Sewage Lagoons (9/10/91). Include data from Item 1 above.

Failure to respond to this requirement could result in the issuance of a 74.4.10.1 Order (Hazardous Waste Monitoring, Analysis and Testing).

If you have any questions regarding this matter, please contact Joseph Kennedy at (505) 827-4300.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward Horst", with a long horizontal line extending to the right.

Edward Horst
Program Manager, Hazardous and Radioactive Materials Bureau

cc: Benito Garcia, Bureau Chief
Bruce Swanton, Technical Supervisor