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Thomas A. Norris, Colonel, USAF  
Director  
Environmental Management Division  
Kirtland Air Force Base, New Mexico 87117-5000

NATIONAL ENVIRONMENTAL DEFENSE DEPARTMENT  
OFFICE OF THE SECRETARY

*VIII*

Dear Colonel Norris:

This is in response to your December 2, 1991 letter pertaining to the RCRA Facility Investigation (RFI) Report for the Appendix I SWMU's (21 SWMU's).

In your letter you requested the Environmental Protection Agency (EPA) clarify what information/data is needed for the RFI Report for the Appendix I SWMU's. Under Kirtland's Hazardous and Solid Waste Amendments of 1984 (HSWA) permit, the base was required to submit a RFI Workplan (permit condition IV.H.2., page 11) to EPA. EPA approved Kirtland's RFI Workplan on September 26, 1991. In this approval letter, EPA required Kirtland to submit the RFI Report for the Appendix I SWMU's by September 26, 1992. In summary, the RFI Report should include all investigation data on the Appendix I SWMU's (soil boring and geophysical data) and must be submitted to EPA by September 26, 1992.

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Under a separate permit condition (IV.C.2.a., pages 6 and 7), Kirtland was required to submit a ground water monitoring well installation plan to EPA for Landfills 1 & 2, and the McCormick Ranch SWMU. When Kirtland submitted the RFI Workplan to EPA, this Workplan also contained the information/requirements for the ground water monitoring well installation plan, permit condition IV.C.2.a. I believe this is where the confusion exists. Thus, permit condition IV.C.2.a., which requires submission of a plan, has been met. However, Kirtland must submit a report to EPA on the results of the ground water monitoring well installation plan (for landfills 1 & 2, and the McCormick Range SWMU) by December 1, 1993. This report should include the well construction details/locations and all sampling results from the newly installed wells.

If you have any further questions on this issue, please contact Richard Mayer of my staff at (214) 655-6775.

Sincerely yours,

Allyn M. Davis  
Director  
Hazardous Waste Management Division

cc: Judith Espinosa, NMED

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