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***Comments on the Draft Work Plan  
Installation Restoration Program Stage 2B  
Kirtland Air Force Base, New Mexico***

**These comments are submitted on behalf of:**  
SouthWest Organizing Project  
Mountainview Advisory Council  
The East Manzano Alliance  
Southwest Research and Information Center

August 17, 1992

KAFB1247  


## **COMMENTS TO KAFB IRP PHASE II/STAGE 2B WORK PLAN DRAFT, 8/17/92, PG.2**

### **Numbering System and Prioritizing for Sites**

This is also very confusing. There are two numbering systems being used: one for the Air Force IRP work, the other for the EPA RCRA program. A standardized numbering system would make it much easier for the public to understand. Also, are the sites listed by the Air Force and EPA the same? Where are there overlaps? Where are there differences? What is the criteria for prioritizing these sites? Are these criteria the same for the EPA and the Air Force? It seems that numbers have changed from previous documents for several sites, making it difficult to reference past studies.

### **Maps and Site Geology**

We do appreciate the acknowledgement of more updated analyses in the report such as Logan and Lozinski. It is also very positive that the Air Force recognizes that there is a greater possibility for base activities to contaminate groundwater than was previously realized. These findings are reflected in Section 2.3.2 (Pg. 57) The recognition of this complex situation requires much deeper examination. Lack of effective application of the most updated and sufficient geologic analysis will create a weak foundation for future work on the IRP.

The WP assessments of the geology at KAFB are very general. The plan must recognize the variance in geology and incorporate this information into the site assessments. The plan must address the variance in geology at each site. In short, the Air Force does not have the information to address the complexities that it now recognizes. The Work Plan should evaluate the sites in detail.

Information gathered through oral communication (pg. 57) is not an adequate resource in itself. These statements should be followed up by gathering first-hand data.

An important recent development in the regional water database is the groundwater model being developed for the Albuquerque Public Works Department by USGS and other scientists. This work is not referenced in the WP and may be a useful resource for the program.

## COMMENTS TO KAFB IRP PHASE II/STAGE 2B WORK PLAN DRAFT, 8/17/92, PG.4

In light of the magnitude of the problems identified at these 67 sites. An average of 4 soil borings per site will be woefully inadequate. A much more comprehensive sampling program is needed.

### *Recommendations:*

- These sites deserve much greater priority. A system to characterize the sites so that a priority system can be developed.*
- Groundwater, surface water and air contamination should also be assessed at the sites.*
- Historical background and geology should be assessed for each site.*
- Expand soil investigations to fully identify and characterize each site.*
- All completed test results and remediations should be reported in a comprehensive manner.*
- Clarify what "cleaned" means as listed on charts (pages 31-32). Does clean mean unaffected?*

### **Site 23, Silver Recovery Unit**

The WP states that "Wastewater from the silver removing process, flows into the sanitary sewer floor drain. No information is available on where the floor drain leads." The plan also calls for only one surface-soil sample at this site; from the trap in a floor drain near the cartridge to determine if leakage from the cartridge has occurred. The plan does not address the issue of the wastewater flowing through the floor drain.

### *Recommendations:*

- Characterize the whole site, including floor drains and distribution pipes, where the floor drain leads, and whether contamination may be occurring at the discharge point.*

### **Site 24, Building 617 - Piping Trench**

The investigation will try to determine if the pipe and concrete trench have contaminated the adjacent soils. Five holes will be drilled and sampled adjacent to the pipe. The WP does not explain whether these holes will be drilled straight or diagonally. If they are drilled straight they may determine if soil next to the pipe is contaminated but not whether soil *underneath* is contaminated.

### *Recommendation:*

- The investigation must address the possibility of contamination underneath the site as well as adjacent to it.*
- Borings must be drilled near the edge of the site.*