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State of New Mexico

**ENVIRONMENT DEPARTMENT**

ENTERED

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October 9, 1992

*File:  
92 Blue*

Colonel Thomas A. Norris, Director  
Environmental Management Division  
542 CTW/EM  
Kirtland Air Force Base, NM 87117-5000

Dear Col. Norris:

Under the the DSMOA agreement between the Department of Defense and the New Mexico Environment Department, NMED has reviewed the Kirtland Air Force Base January 1992 Installation Restoration Program Stage 2B workplan (received on August 28, 1992). We offer the following comments on the workplan.

General comments:

The numbering system(s) for Kirtland's IRP sites and SWMUS is indeed a major source of confusion. We request a comprehensive cross-reference list of the sites and all the numbers they have been assigned in the past, and would be more than happy to assist in preparing the list. We also strongly suggest you instruct USGS to abandon the practice of assigning their own numbers to sites, and use either the accepted IRP numbers or the SWMU numbers. No other DoD contractor in New Mexico has this practice.

It would also minimize confusion, particularly among the public and reviewers not familiar with the IRP process, if you adopted either standard CERCLA report nomenclature (eg PA, SI, RI, FS etc.) or standard RCRA nomenclature (eg RFI, CMS, etc.). We concur with EPA's general comments about the layout and format of workplan presentation.

For sites where prior relevant work has been done (for instance, the oil/water separators), please include references to documents describing the previous work.

The list of applicable or relevant and appropriate requirements is inadequate. At a minimum, the New Mexico Water Quality Control Commission Regulations, the New Mexico Underground Storage Tank Regulations, and the proposed RCRA Subpart S Corrective Action Regulations must be added to the list of ARARs.

We would appreciate a chance to be included in the data evaluation team mentioned on page 79. We also request that you include NMED DSMOA staff in the distribution list for all IRP-related correspondence or documentation. Please send such material to David Morgan, NMED Ground Water Protection and Remediation Bureau, at the address given below.



A description of the kind of lithological logging or other geological information that will be collected and recorded from the various soil borings and wells should be included in the workplans for each site (i.e. will continuous lithological sampling be done, will sampling be done at specified intervals, what sort of sampling device will be used, etc.).

Comments on specific sites follow.

**RB-11 (site 16):** We strongly support comments made by Mr. John Gould at the September 2 meeting with citizens' group representatives that KAFB's intent was to revise the workplan for this site to include a horizontal soil boring beneath each trench, rather than three borings intersecting the trenches. Details of sampling locations, field screening, and so forth would need to be explained but in principle we support the approach and are very interested in how the method performs in the field. We would have some reservations as to whether the three borings as described in the workplan would provide enough sampling points to demonstrate lack of contaminant migration.

While we agree that the most urgent question is whether contaminants are migrating below the landfill, we are concerned about the contents of the landfill trenches as well. We appreciate the problems posed by investigation-derived mixed waste, but do believe there is a regulatory requirement ultimately to characterize the landfill contents. Discussions are underway within NMED on appropriate methods and requirements for abandoned landfill characterization, since this is a problem affecting every DoD facility in New Mexico, as well as many other landfills. There may well be acceptable alternatives to hollow-stem augering for collecting samples of the landfill contents.

**Oil-water separators, etc. (site 22):** We again support comments made at the September 2 meeting that, per EPA request, work at each oil-water separator or similar discharge point will be described individually. We are concerned that the locations of the individual units given on the workplan diagrams do not always match the locations on our copy of Base-wide site maps. Our interest of course is simply that all such units are identified and sampled, and the information from that sampling is easily accessible. Toward that end, if KAFB or USGS staff will be visiting these sites in preparation of the revised workplan, we would appreciate a chance to accompany them.

As mentioned under general comments above, a bibliography of information available from previous work on these sites should be included in the workplan and in the final report.

**Silver Recovery Unit (site 23):** The most important job at this site seems to us to be confirming the destination of the drain pipe(s), and sampling at the outfall(s) of the pipes if they are not, or were not, connected to the sanitary sewer system. It may be impossible to obtain a sample from the inside of the piping itself (and indeed virtually impossible to contaminate it). If possible, the piping should be tested for leaks; we recognize that this may not be possible.

**Piping trench (site 24):** The concrete pipe trench should be visually inspected for cracks; soil sampling should be done adjacent to any appreciable cracks. If there are no appreciable cracks, three random sampling locations seems fine. Angled soil borings would be preferable here.

**Dilution (neutralization) pit (site 25), and dilution pond (site 26):** You are presumably aware of the potential dangers to workers from hydrogen fluoride gas (OSHA PEL is only 3 ppm). Adequate safety precautions must be included in the site safety and health plan.

Soil sampling and analysis must provide information on fluoride migration beneath these units; fluoride is a regulated contaminant under NM WQCC regulations (and drinking water MCLs). Angled soil borings are definitely needed for the dilution pond and preferable for the neutralization pit.

**Manzano fire training area (site 27):** Two monitor wells will not really indicate the ground water flow direction. At least three wells will be needed to define the gradient and demonstrate whether you have indeed provided downgradient monitoring.

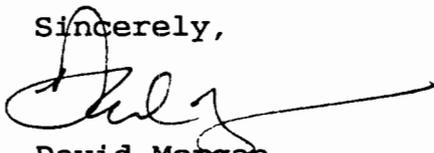
**Waste oil tanks (sites 28 & 29):** Soil gas monitoring alone will not be a dependable way to identify motor oil leaks, because there frequently are not enough volatile compounds present. To our knowledge there is no substitute for laboratory analysis of soil samples to check for oil contamination. We suggest (in addition to the samples mentioned) sample collection at a foot or two below the bottom of the tanks, and 5 to 10 feet below the bottom of the tanks.

No tank investigation can be considered complete without assurance that the tank is not currently leaking. Based on the description in the workplan, it appears that these tanks should already have been leak tested under the UST regulations. If this is the case, it would serve as adequate demonstration of tank tightness; if not, they should be tested as part of this investigation.

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Please do not hesitate to call me at 827-2754 if you have any questions or if I can be of any assistance in this matter. I would appreciate knowing your response to these comments. If you concur, a copy of the revised workplan is adequate; if you disagree with the comments or believe an alternative approach is preferable, please let me know as soon as possible.

Sincerely,



David Morgan  
Environmental Specialist, DSMOA  
Ground Water Protection and Remediation Bureau

c: John Gould, KAFB  
Edward Horst, NMED HRMB  
Barbara Hoditschek, NMED HRMB  
Garth Graves, NMED Dist. 1  
Bill McDonald, NMED DoE oversight  
Michael Guerrero, SWOP