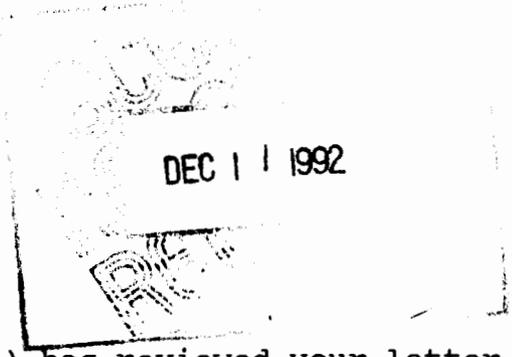


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Thomas A. Norris, Colonel, USAF  
Director  
Environmental Management Division  
542d CTW/EM  
2000 Wyoming Blvd S.E., Suite #5659  
Kirtland AFB, New Mexico 87117-5659



Re: Resampling Schedule for Soils  
Kirtland AFB NM9570024423

Dear Colonel Norris:

The Environmental Protection Agency (EPA) has reviewed your letter dated October 28, 1992, and determined that your proposal of a new resampling schedule and a submittal date of March 12, 1993 for the Soils RFI Report is acceptable. In addition, Kirtland has cited several instances of analytical problems and proposed several remedies for these problems.

It is unclear from your letter, part 2.c., how Kirtland has determined that the organic analytes detected (Acetone, 2-Butanone, Xylene, and the phthalates) are lab contaminants. Please specify if these analytes were discovered in the laboratory blanks or trip blanks.

Following is a response to Kirtland's request for a variance from resampling several sites at which holding times were missed for the samples collected:

**Site 1, Landfill 1:**

1. The 99-foot sample in hole 10 (KAFB0110) need not be resampled for semi-VOC's as no semi-VOC's were detected in any of the other holes at this site.
2. EPA agrees with your proposal to resample hole 14 for VOC analysis.
3. The sample at 25 feet in hole 16 (KAFB0116) need not be resampled as VOC's were not detected at any other samples in this hole.

**Site 2, Landfill 2:**

EPA agrees with your proposal to resample at 6 feet in hole 16 for VOC's.

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**Site 3, Landfills 4/5/6:**

EPA agrees with your proposal to resample hole 11.

**Site 4, Fire Training Area:**

The samples in holes 18 and 19 need not be recollected as no semi-VOC's were detected in any of the other holes, and the holding times were only missed by one day.

**Site 10, McCormick Ranch:**

Kirtland does not have to resample these five holes for explosive analytes in USATHAMA method LW12. EPA agrees with Kirtland resampling the five proposed locations for nitroglycerin and PETN which the lab did not analyze for.

**Site 15, Manzano Dump:**

Kirtland does not have to resample hole 3 (KAFB1503) as the holding time was missed by only one day, and no VOC's were detected in any of the other samples collected.

**Site 18, Unnamed Dump:**

1. EPA agrees with Kirtland's proposal to resample hole 9.
2. Kirtland should resample all 12 locations and analyze for nitroglycerin and PETN. Kirtland does not need to collect or analyze any additional samples due to missing the holding times for the USATHAMA method LW12 at this site.

**Site 21, Landfill B:**

EPA agrees with Kirtland's proposal to resample hole 1.

EPA anticipates that Kirtland has resolved all its problems with its laboratory, and that in the future these types of problems will not occur.

Should you have any questions, please contact Barbara Driscoll of my staff at (214) 655-6785.

Sincerely,

William K. Honker, P.E.  
Chief  
RCRA Permits Branch (6H-P)

cc: Benito Garcia, NMED

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