



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 377TH AIR BASE WING (AFMC)



377 ABW/EM
2000 Wyoming Blvd SE
Kirtland AFB, NM 87117-5659

7 May 1993

Ms Barbara Hoditschek
Program Manager, RCRA Permits
Hazardous and Radioactive Materials Bureau
Harold Runnels Building
PO Box 26110
1190 St. Francis Drive
Santa Fe NM 87502

RE: DUE DATE FOR CLOSURE CERTIFICATION AND REPORT FOR BASE
SEWAGE LAGOONS AND GOLF COURSE MAIN POND

Dear Ms Hoditschek

We received your 7 April 1993 letter on 12 April 1993. This letter is pursuant to the conversation between our Mr Walter S. Darr and your Ms Stephanie Stoddard on 27 April 1993. As they discussed, we are submitting the following outline in order to request a modification to the closure activities outlined in your letter dated 7 April 1993 (Atch 1). Specifically, we previously proposed, in a letter dated 30 November 1992, a modification to the closure plan for the Base Sewage Lagoons and Golf Course Main Pond (Atch 2). These modifications were approved in a letter dated 4 January 1993 from the State of New Mexico Environment Department (Atch 3), along with approval for the Sampling and Analysis Plan dated November 1992.

We have been mobilizing in response to those approved plans, and at the time of our conversation, were ready to initiate the proposed modification as outlined in the 30 November 1993 letter, with a completion date for the drilling and analysis scheduled for 17 May 1993. We are still mobilized to proceed.

Based on the proposed modifications originally submitted, i.e., 30 November 1992 or a new alternative program, we have already contacted a field crew that can be mobilized within three (3) working days (based on notification), and can conduct all drilling, sampling, and associated record-keeping and compliance requirements within four (4) working days. In addition, we have on stand-by a qualified analytical laboratory that will perform the required analysis, i.e., SW 846 (8240 Volatiles) per your conversation with Mr Darr. We have negotiated the analytical portion of this plan to be completed within five (5) to seven (7) working days, based on our original proposal, i.e., the scheduled

KAFB1304



deadline based on the 7 April 1993 notification. It is anticipated that the submittal of the final report, demonstrating acceptable compliance for "Closure of the Base Sewage Lagoons and Golf Course Main Pond", would then be complete within thirty (30) days of receipt of the analytical information.

At this time, we are on stand-by waiting further clarification from your office as to the specific program plans that should be followed.

I appreciate your time and input that have been offered in an effort to complete the project, and I look forward to your office's recommendations and notice to proceed.

If you have any questions, please contact Mr Walter S. Darr III at (505) 846-0029/0042.

Sincerely



GEORGE K. PRATT, Lt Col, USAF, BSC
Acting Director
Environmental Management Division

3 Atch

1. Your Ltr, 7 Apr 93
2. Our Ltr, 30 Nov 92
3. Your Ltr, 4 Jan 93



BRUCE KING
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

CC: DAVIDSON
GOULD

April 7, 1993

Colonel Thomas A. Norris, USAF
Director
Environmental Management Division
337th ABW
2000 Wyoming Blvd. SE Suite 5659
Kirtland AFB, New Mexico 87117-5659

RE: DUE DATE FOR CLOSURE CERTIFICATION AND REPORT FOR BASE
SEWAGE LAGOONS AND GOLF COURSE MAIN POND

Dear Colonel Norris:

A closure plan for the Base Sewage Lagoons and Golf Course Main Pond was approved November 26, 1991. According to the New Mexico Hazardous Waste Management Regulations (HWMR-7), Part VI, Section 40 CFR 265.113(b), Kirtland Air Force Base (KAFB) must complete final closure activities in accordance with the approved closure plan within 180 days after its approval. KAFB requested and was granted a 180 day extension to complete all closure activities by November 20, 1992.

In a letter to the New Mexico Environment Department (NMED) dated October 20, 1992, KAFB stated that quarterly groundwater monitoring results for the units indicated contamination of 2 Butanone. KAFB's proposal to verify the presence of contamination was agreed to by NMED on October 27, 1992. However, NMED required KAFB to submit confirmation groundwater monitoring sampling results by March 31, 1993. This due date was based upon KAFB's anticipated delay in receiving laboratory reports for the groundwater sampling from the analytical laboratory. The October 27, 1992 letter from NMED did not extend the due date of November 20, 1992 for completing all other closure activities. NMED is concerned that KAFB has not completed all closure activities and did not submit certification of closure by March 31, 1993 as implied in our October 27, 1993 letter.

624 003

ATCH 1

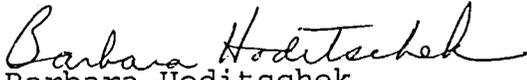
KAFB
4/7/93
Pg. 2

Within 30 days of your receipt of this letter, KAFB's closure certification and closure report for the Base Sewage Lagoons and Golf Course Main Pond or an official request for a closure plan modification must be received by NMED. Any request to modify the approved closure plan must be in writing and include a firm schedule for completing all remaining closure activities within 60 days of your receipt of this letter. Failure to meet either of the above mentioned due dates will result in the issuance of a Letter of Violation (LOV) or a Compliance Order (CO) to require compliance with the approved closure plan. *May 12*

Minor changes to the approved closure plan which are made in the field during implementation of the closure activities and which qualify for a Class I modification must be documented in the closure report and justified with KAFB's reasons for doing so. Class II or Class III changes [per 40 CFR 265.112 (c)(4)] are major changes which NMED must issue for public comment and be approved before KAFB may implement these changes.

If there are any questions regarding this matter, please contact Ms. Stephanie Stoddard of my staff at (505) 827-4308.

Sincerely.


Barbara Hoditschek
Program Manager, RCRA Permits

xc: Benito Garcia, Chief, HRMB
File: Red 93

624 004



DEPARTMENT OF THE AIR FORCE
GLOBAL CREW TRAINING WING (AMC)

28 mjr

30 NOV 1992

542d CTW/EM
2000 Wyoming Blvd SE
Kirtland AFB, NM 87117-5659

Ms Stephanie Stoddard
Water Resource Specialist
Hazardous and Radioactive Materials Bureau
PO Box 26110
525 Camino de los Marquez
Santa Fe NM 87502

Dear Ms Stoddard

The approved closure plans for the base sewage lagoons and golf course pond state that Kirtland will perform a soil gas survey at these sites to confirm that there is no evidence of contamination by volatiles in the vadose zone. Since no contamination by hazardous waste has been found in soils, sludges or groundwater at these sites, we do not anticipate a problem in the deeper vadose zone. However, we feel that we can document the status of the vadose zone more effectively by using soil borings.

Therefore, we request approval of a modification of the closure plans that will allow us to terminate the soil gas survey and perform soil borings that otherwise would have been necessary only if the soil gas survey had detected the presence of contaminants.

We propose the following:

a) Soil augering to a depth of ten feet at the same locations at which the sludge and surface soil sampling was conducted (five locations in each of the two lagoons and three locations in the golf course pond). We feel that samples collected at ten feet would be below the level of active volatilization while being above soil depths where dispersion could result in possible contaminants being below detection limits.

B) Collection of a soil sample at the ten foot depth in each hole, and analysis for volatile organic compounds.

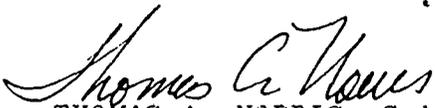
c) Borings will be monitored using a photoionization detector (PID) for field headspace analysis. If volatiles are detected during boring, the hole will be deepened and samples screened using the PID. The goal is to obtain two sequential samples at five foot intervals that are not contaminated, to verify that the depth of contamination has been determined.

Generally, two uncontaminated soil samples below an area of contamination are required to document that the vertical extent of contamination has been determined. Soil samples collected from the top one foot of soil below the sludge at these sites has already been shown to be uncontaminated. If the samples collected at ten feet are also found to be uncontaminated, we feel that we will have adequately demonstrated that the vadose zone is not contaminated.

As stated above, if contamination by volatiles is detected during the borings, the holes will be deepened until two clean samples can be collected. We will then request a meeting with you to discuss these findings.

If you have any questions, please contact John Gould at 846-2773.

Sincerely



THOMAS A. NORRIS, Colonel, USAF
Director
Environmental Management Division

cc: NMED (Mr Dave Morgan)
AFCEE (Jo Mullen)
ICF Kaiser (Spencer Sepponen)



BRUCE KING
GOVERNOR

State of New Mexico
ENVIRONMENTAL DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

17 JAN
CC: / / Davidson
J. Gould

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

January 4, 1993

Colonel Thomas A. Norris
Director, Environmental Management Division
542 CTW/EM
2000 Wyoming Blvd. SE
Albuquerque, New Mexico 87117-5659

Dear Colonel Norris:

The Hazardous and Radioactive Materials Bureau (HRMB) is in receipt of the request for approval of a modification to the closure plan for the Base Sewage Lagoons and Golf Course Main Pond dated 11/30/92. HRMB in previous correspondence (11/18/91) approved the employment of soil-vapor surveys yielding semi-quantitative data as part of a clean-closure alternative for both units, requiring Kirtland Air Force Base (KAFB) to conduct further soil sampling by SW 846 methods only in the event that contamination is confirmed via the soil-vapor survey.

HRMB has reviewed and hereby approves the proposed modification as outlined in your 11/30/92 letter. HRMB does not view this request as a departure from the approved closure plan; therefore, no public notification is required. In addition, HRMB hereby approves the United States Air Force Environmental Restoration Program Sampling and Analysis Plan dated November 1992 as an amendment to the closure plans for the Sewage Lagoons and Golf Course Main Pond. ✓

If you have any questions, please contact Ms. Stephanie Stoddard of my staff at (505) 827-4308.

Sincerely,

Barbara Hoditschek
Barbara Hoditschek
RCRA Permits Program Manager

xc: Mike Silva. H+GCL
File

624 007

ATCH 3