



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

BRUCE KING
 GOVERNOR

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

September 27, 1993

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

**Re: NMED Denial of Clean Closure for Golf Course Main Pond and
 Base Sewage Lagoons NM9570024423**

Dear Colonel Norris:

The New Mexico Environment Department (NMED) hereby denies clean closure for the Base Sewage Lagoons and the Golf Course Main Pond, two regulated units located at Kirtland Air Force Base (KAFB). The supporting documentation submitted pursuant to 40 CFR 265.115 for clean closure of these units indicates that the closure was completed in substantial conformance with the NMED approved closure plans, dated September 10, 1991. However, the data collected to date does not demonstrate that clean closure has been achieved. To be specific, results from groundwater sampling and analysis (downgradient wells) show concentrations of chromium exceeding New Mexico Water Quality Control Commission (WQCC) standards:

KAFB - GROUNDWATER CHROMIUM LEVELS (ppb)

<u>Sewage Lagoons</u>	<u>9/90</u>	<u>1/91</u>	<u>3/91</u>	<u>6/91</u>	<u>1/92</u>	<u>7/92</u>
MW-0501	140*	2.4	28	ND	7.5	ND
MW-0502	45	ND	3.7	ND	ND	ND
MW-0503	120*	82*	37	24	55*	12
MW-9594	29	6.1	5.9	3.3	3.3	28



KAFB
9/27/93
Pg. 2

Golf Course Main Pond

MW-0602	240*	13	19	11	ND	17
MW-0608	38	8.3	75*	11	11	ND
MW-0609	31	47	28	7.6	25	28
MW-0610	51*	14	53*	15	12	ND

[Note: Chromium values with an asterisk (*) exceed the NM WQCC MCL; ND = Non Detect]

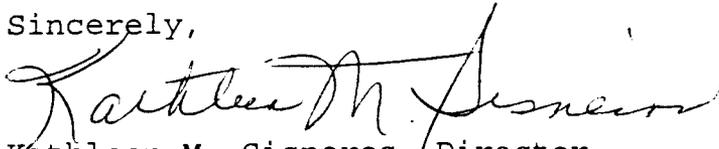
This decision to deny clean closure, based upon currently available data, supersedes our previous correspondence dated July 3, 1991 which states no Appendix IX constituents have been detected at either unit.

KAFB must submit a post-closure plan (one plan may be submitted that addresses both units) to the Hazardous and Radioactive Materials Bureau (HRMB) within ninety days of your receipt of this letter. The post-closure plan must address all requirements of the New Mexico Hazardous Waste Management Regulations (HWMR-7), Part VI, 40 CFR §§ 265.117 - 265.120. As part of the post-closure plan, KAFB may include procedures for demonstrating that a source other than the regulated units caused the contamination, or that the detection is an artifact caused by error in sampling, analysis, or natural variation in the groundwater. The failure to conclusively demonstrate that these units meet the requirements for clean closure will necessitate that KAFB proceed immediately with post-closure care as specified in the post-closure plan. The conditions under which to proceed to post-closure care must be written into the plan. In addition, the post-closure plan must contain a schedule with milestones for completion of all activities.

In the event KAFB is able to demonstrate that clean closure standards have been met for these units, NMED will reconsider the denial decision made at this time, and KAFB will be released from conducting post-closure care activities.

HRMB staff are available to meet with KAFB staff to discuss this issue. Please contact Ms. Barbara Hoditschek or Ms. Stephanie Stoddard at (505)827-4308 if you have any questions.

Sincerely,


Kathleen M. Sisneros, Director
Water and Waste Management Division

xc: Benito Garcia, HRMB
Walt Darr, KAFB