

KAFB 94

MEMORANDUM

TO: File KAFB/Red/94

FROM: Ron Kern, RCRA Technical Compliance Program

DATE: January 13, 1994

SUBJECT: **Meeting Between HRMB and Kirtland Air Force Base Personnel Related to the Sewage Lagoons and Golf Course Main Pond**

A meeting between personnel from Kirtland Air Force Base (including their consultant - D.B. Stephens & Assoc., Inc.) and HRMB (Permitting and Technical Compliance) was held in Santa Fe on January 10, 1994. The purpose of this meeting was to discuss concerns of KAFB's January 3, 1994 draft Post-Closure Care Plan for the Sewage Lagoons (SL) and Golf Course Main Pond (GCMP). Technical concerns related primarily to KAFB's proposed Phase 1A Sampling and Analysis plans for the Post-Closure Plan.

KAFB and their consultant were informed at this meeting that "technical needs" of an adequate Phase 1A Post-Closure Plan should include the following:

1. KAFB must generate a good and complete set of defensible data from all the monitoring wells situated at these two RCRA units.
  - a) To accomplish this goal, HRMB believes that four (4) consecutive quarters of groundwater data, with analysis at a minimum for total chromium, are necessary. These data should allow for a reasonable evaluation of seasonal and/or natural variation in groundwater quality.
  - b) Good QA/QC (field and laboratory) is necessary. Samples with matrix spike and matrix spike duplicates which are out of limits are unacceptable.
  - c) HRMB agrees that non-filtered groundwater samples should be collected carefully to maintain turbidity at NTU less than 5.
  - d) Analysis of total Cr by Method 7191 (PQL = 10 ug/l) might be more appropriate than by Method 6010 (PQL = 70 ug/l) because the MCL for Cr in groundwater is 50 ug/l and because detection limits should be as low as possible for detection of background Cr in the groundwater. Samples will also be analyzed for hexavalent Cr and turbidity.

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2. KAFB should consider strongly instituting a program to determine background concentration of Cr in the groundwater in the vicinity of the SL's and GCMP.

a) KAFB should propose in the revised Post-Closure Plan what wells, etc. would be utilized for an adequate background study.

b) KAFB should also propose what will trigger initiation of a background study (e.g. concentrations of Cr in environmental samples at half MCL).

c) If a background study is triggered by a quarterly data set, background samples should be collected immediately for comparison with the pertinent data set. Thereafter, background samples should be collected at the same time as environmental samples for subsequent quarterly sampling events. This may generate a good set of defensible background data for total Cr in the groundwater. Samples should probably be analyzed also for hexavalent Cr and turbidity.

3. KAFB proposes to collect four sludge subsamples at each SL and to composite these subsamples into two samples which are representative of each SL. HRMB suggests that compositing and homogenization should be done at the laboratory, and that subsample splits should be kept separate in the event that further analysis of any subsample might be necessary. HRMB suggests that subsamples be collected from the total thickness of sludge at each subsample site. Sludges will be analyzed for total Cr, hexavalent Cr, and TCLP Cr.

cc: Steve Alexander, Technical Compliance Program Manager