



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

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24 Jan 94

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Ms Nancy Morlock
Environmental Engineer
RCRA Permits Branch
EPA Region 6, Suite 1200
1445 Ross Avenue
Dallas, TX 75202-2733

SS

Re: Kirtland AFB (ID No. 9570024423) 2C RFI Radioactive Burial Sites

Dear Ms Morlock

This correspondence is in response to our discussion on 13 Jan 94 at EPA's Region 6 Headquarters concerning Halliburton NUS's proposed investigation of two radioactive burial sites presently being investigated under the requirement of a RCRA Permit issued (effective date 14 Nov 90) to Kirtland Air Force Base (AFB).

The RCRA Permit identified three groups of sites containing Solid Waste Management Units (SWMUs) that are to be investigated under the RCRA Corrective Action Process. The three groups of sites are designated in the Permit as Appendix I, II, and III and represent sites having potential impact (from I to III, in decreasing order of concern) to human health and the environment.

The current status of the sites is as follows:

(1) The Appendix I sites have been investigated by the United States Geological Survey and an RFI Report has been generated and is presently being reviewed by the EPA.

(2) An EPA-approved Work Plan for the Appendix II sites is currently being implemented by the United States Geological Survey and Halliburton NUS. Generally, the sites Appendix II consists of oil/water separators and similar waste-related features. One anomalous site in Appendix II is an inactive radioactive animal burial area identified as RB-11. Field work is scheduled to begin at RB-11 in March 1994. The Draft Final Appendix II RFI Report (which will included RB-11) is due to the agency by 31 Dec 94.

(3) The Draft Work Plan for Appendix III sites is being prepared by Halliburton NUS and will be submitted to the agency by 31 Jan 94. There are 134 sites identified in Appendix III, most of which are inflow/outflow pipes associated with oil/water separators, sewers, septic systems and drains. An inactive radioactive laboratory waste burial site referred to as RB-7 will

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also be included in the Appendix III work Plan. The due date of the Draft Final Appendix III RFI Report is 18 months after EPA approval of the work plan.

The investigative methods required for typical radioactive waste sites (i.e., field procedures, level of health and safety requirements, laboratory analyses, etc) are significantly more demanding than those used for waste lines and holding tanks for residential/industrial wastes.

Halliburton NUS has its roots in the nuclear energy services and has considerable experience in conducting investigations at radioactive disposal sites and is aware of the potential delays associated with investigating such sites. In order not to impede the RFI process for either the Appendix II or II sites, Halliburton NUS request that the two above listed radioactive burial sites be investigated together and that a separate group of sites be established (Appendix IV?) and investigated under the same time schedule. Provided these sites are combined into one group, with an approved Work Plan for RB-7 by 28 Feb 94, Halliburton NUS would agree to meet the 31 Dec 94 due date for submittal of a Draft Final RFI for both RB-11 and RB-7. If the work plan for RB-7 is not approved by 28 Feb 94, we recommend the RFI reports for these two sites be submitted separately. The RB-11 draft RFI report would be submitted by 31 Dec 94, and the RB-7 draft RFI report would be submitted 18 months after EPA approves its work plan. Due to the very aggressive scheduling requirements for the proposed effort, it is imperative that the EPA respond to this request prior to our submission of the Appendix II Work Plan on 31 Jan 94.

Kindly notify me at (505) 846-0003/0054 if I can provide clarification or explanation to this correspondence.

Sincerely



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