



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



Ms Barbara Hoditschek
Program Manager, RCRA Permits
NMED, Hazardous & Radioactive Materials Bureau
525 Camino de los Marquez, Suite 4
Santa Fe NM 87502

Dear Ms Hoditschek,

Thank you for allowing Kirtland Air Force Base (KAFB) personnel to meet with your staff on 10 January 1994 to discuss the Draft Post-Closure Plan for the Sewage Lagoons and Golf Course Main Pond regulated units at KAFB. As a result of this meeting, KAFB and NMED personnel reached agreement on the changes to the plan needed to meet NMED's approval requirements under the New Mexico Hazardous Waste Management Regulations (HWMR-7), Part VI, 40 CFR Sections 265.117 - 265.120.

Below is a summary of the agreements made and required changes to the post-closure plan which resulted from the 10 January meeting as understood by KAFB.

- The final post-closure plan is due for submittal to NMED on or before 10 February 1994.
- Two hard copies and one copy in Word Perfect on 5 1/4-inch floppy disk will be submitted to NMED (version of Word Perfect to be determined).
- A detailed discussion of the background calculations performed by the USGS in the Stage 2A RFI Report will be provided.
- A more detailed description of sampling techniques and equipment will be provided.
- The Phase 1A and 1B concept will be abandoned in favor of a Phase 1 and Phase 2 concept.
- Phase 1 will consist of the one-year quarterly water sampling of all eight monitor wells previously described as Phase 1B, but shall also include the sampling of sewer lagoon sludge as previously described as part of Phase 1A.

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Sludge will be submitted to the laboratory as a composite sample, but individual location samples will be retained for additional testing if required. A background determination investigation scheme will be developed and provided as part of Phase 1. This investigation will be initiated immediately after results of the first quarterly sampling round are available and indicate that Total Cr levels are near MCLs. If initiated, it will continue on a quarterly basis thereafter for the remaining sampling rounds.

- Phase 2 will consist of an outline of proposals to address potential problems and/or scenarios that meets the basic post-closure care requirements of RCRA (40 CFR, Sections 265.117 through 265.120). The conditions under which to proceed to post-closure care shall be written into the plan. It is understood that a more detailed post-closure care plan will be submitted if Phase 1 results indicate those conditions requiring post-closure care are met and NMED requires submittal. Phase 2 activities will not be performed until results of Phase 1 are analyzed and indicate that post-closure care is required.

If you have any questions regarding this request or these units, please contact me at 846-0053.

Sincerely



CHRISTOPHER B. DeWITT, R.P.G.
IRP Geologist
Environmental Management Division