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COMMENTS: Draft comments on Appendix 3 work plan. I've circled items that seem to be critical - perhaps you can concentrate your review on those items. Thanks Nancy Morlock			
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Draft

**Kirtland Air Force Base
Appendix III (Stage 2C) RFI Work Plan**

Comments and modifications have been divided among the five (5) separate plans which constitute the Appendix III Work Plan: Non-Waste Line Investigation; Waste Line Investigation; Data Collection Quality Assurance Plan; Project Management Plan; and the Health and Safety Plan. General comments that pertain to the entire Appendix III Work Plan are also included. Comments are keyed to the section numbers of the document, as well as to the paragraph ("p") number or figure ("f") number, as applicable.

GENERAL COMMENTS

1. Proposed analytical methods should be specified on the individual sampling plan tables for each SWMU, or the location of the proposed analytical methods should be referenced (ie. "see Table 1-2, Data Collection Quality Assurance Plan").
2. Throughout the Work Plan, Kirtland states in the "Work Plan and Rationale" sections that "The investigation will be limited to ..." However, because in many instances the proposed investigation is really a Phase 1 investigation, this wording is incorrect. A Phase 2 investigation may be initiated depending upon the results of the Phase 1 investigation. Kirtland should revise this language so that it is not unnecessarily limiting.
3. Kirtland should revise the "Investigative Plan" figures to show that No Further Action may be proposed, but not necessarily granted. The word "proposed" should be added below "NFA" in each figure.

NON-WASTE LINE INVESTIGATION

1. Section 1.2.2
Kirtland indicates that no interim corrective measures have been implemented at any sites at Kirtland. The EPA understands, however, that several oil-water separators are or have been excavated and removed as a result of EPA comments on the Appendix II (Stage 2B) RFI Work Plan. Additionally, the Bioventing Project at the Fire Training Area is considered an interim measure. Kirtland should reference these activities in this portion of the Work Plan.
2. Section 1.3.1, p. 1
Kirtland states that "At many of these sites, no further action will be necessary if the facilities are functioning properly without leakage." Kirtland should revise this statement to read, "...no further action may be proposed."

3. General Site Information and Data Evaluation and Management
Section 2.3.1, p. 2
Kirtland states that "The likelihood of contamination reaching the water table (which is at least 280 feet below these sites) is small." Kirtland should revise this statement to read that the necessary RFI activities will be carried out to prove or disprove this theory.
4. General Site Information and Data Evaluation and Management
Section 2.3.2, p.3
See Modification 3 (above). Kirtland should add that the necessary RFI activities will be carried out to prove or disprove this theory.
5. General Site Information and Data Evaluation and Management
Section 2.4.1, t.1
The EPA is not approving the data contained in this table at this time. The data is from Kirtland's Appendix I, Stage 2A, draft RFI Report which has not been reviewed or approved by the EPA as of this date.
6. General Site Information and Data Evaluation and Management
Section 2.5, p. 1
Kirtland should note that action levels are used to determine the need for a Corrective Measures Study (CMS), although a CMS may be required even if action levels are not exceeded.
7. General Site Information and Data Evaluation and Management
Section 2.5.1
Kirtland is not required to complete a risk assessment as part of their RFI. However, any voluntary risk assessments completed during the RFI used for No Further Action demonstration shall be subject to EPA review and approval.
8. General Site Information and Data Evaluation and Management
Section 2.5.3, p.1
Future land use should be considered residential, unless Kirtland has finalized their land use plans and obtained the necessary public input on future land use.
9. ST-200, SWMU 10-3, Waste Oil Tank 20215, AFES Service Station
Section 5.4, p.1
Due to the age and construction of Waste Oil Tank 20215, and due to the fact that it is an active site, Kirtland should consider conducting a tank test. If the results of the tank test indicate the presence of a leak, the tank should be taken out of service immediately.
10. ST-336, SWMU 10-2, Building 704, Jet Engine Test Cell
Section 11.4, p.1
It is not clear whether any or all of the proposed four (4) soil borings will be drilled in the fill area, or if they will

only be drilled along the concrete ramp itself. Kirtland should clarify this portion of the Work Plan.

11. ST-338, SWMU 0-0, Horizontal Dipole Drum Rack
Section 13.4, p.1
Is the soil pile from the spill incident still on-site? Is the soil pile located on bare ground or gravel? If so, is the pile covered? The spill occurred nearly two-and-a-half years ago.
12. ST-274, SWMU 8-41, Building 20423, Waste Battery Storage Area
Section 15.4, p.1
In addition to lead and mercury, Kirtland should also sample for TCL SVOCs.
13. ST-341, SWMU 0-0, Building 1033, Condensate Holding Tank
Section 16.4, p.1
Kirtland should also install one (1) soil boring at the discharge point in the evaporation pond. The boring should extend vertically to five (5) feet below grade. Soil samples should be collected near the surface and at completion depth. Samples should be analyzed for VOCs and TPH.
14. Section 17.0, RW-21, AOC 6-A, Radioactive Waste Disposal Area
Number 7
Kirtland may proceed with the investigation of this SWMU as outlined in this Work Plan. The draft RFI Report for this SWMU shall be submitted to the EPA for review and approval by December 8, 1994.

WASTE-LINE INVESTIGATION

1. Section 4.0, Oil/Water Separator, Sediment Trap and Holding Tank Inflow and Outflow Lines - General Comment
Kirtland has proposed installing soil borings along inflow and outflow lines measuring more than 50 feet in length. Kirtland has proposed collecting soil samples from near the surface to 12 feet below grade for field screening. Kirtland should include the rationale for installing borings every 50 feet.

Because some of these inflow and outflow lines measure more than 200 feet in length, one sample location is insufficient to detect a release. Kirtland should instead sample every 50 feet, regardless of the Appendix II/Stage 2B sampling results. Lines shorter than 50 feet do not require sampling if the adjacent Oil/Water Separator has been sampled under the Appendix II/Stage 2B investigation. Samples should be located preferentially at areas where the line may make a bend, a connection, etc.

2. Section 4.13.2, ST-216, Building 471, Oil/Water Separator Lines, p.1
Kirtland states in the second sentence of this paragraph that, according to the Stage 2B Work Plan, the "bottom of the south compartment of this unit is broken out." However, the Stage 2B Work Plan only states that the bottom of unit ST-215 is broken out. Please clarify this section.
3. Section 4.40.1, ST-252, Building 20348, Oil/Water Separator Lines, p.1
The discussion in this paragraph is unclear. Discharge is stated to be 100 feet eastward to the storm sewer, and also 100 feet eastward to the sanitary sewer. Inflow to the unit is stated to be both from surface flow from washracks and storm runoff. Please clarify.

Drain Lines

1. General Comment

Kirtland should install soil borings along all inflow and outflow lines that are greater than 50 feet in length, regardless of the sampling results from the Appendix II/Stage 2B investigation.

2. Section 5.1.3, WP-38, Building 20687, p.2

Kirtland states that "Soil borings scheduled for this unit during 2B activities have not been performed." However, the Stage 2B Work Plan does not include this unit. Please explain what planned work this statement is referencing.

Storm Sewer Systems

1. General Comment

Kirtland should specify the age of the storm sewer systems. Were the systems installed all at once, or were different portions of the different systems installed at different times?

2. General Comment

How will Kirtland ensure that no leaks or breaks exist in the line upstream (north) of the proposed sampling points? The proposed sampling points at the system discharge points appear to only confirm or deny the presence of hazardous constituents at the discharge points. Kirtland's permit specifies the "Storm Sewer Systems" in Appendix III, and not the "Storm Sewer System Discharge Points." Kirtland should justify their approach or propose additional sampling locations along the length of the storm sewer systems.

Septic Tanks, Leach Fields and Inflow and Outflow Lines

1. General Comment

The EPA objects to the consistent use of the word "may" in the "Work Plan and Rationale" sections of this Work Plan:

- a. Kirtland states that "Dye tests may be used to verify discharge locations." If a discharge location is unknown, Kirtland should definitively state the methods that will be used to determine the discharge location.
- b. Kirtland states that "If contamination is present in the soil samples collected ... additional soil sampling may be warranted." This statement contradicts Figure 7-1 which indicates that additional sampling will be performed if contamination is detected. Again, Kirtland needs to definitively state their proposed investigation.

Sanitary Sewer Systems

1. General Comment

Sanitary Sewer Systems A through G appear to only comprise the very northwestern portion of Kirtland AFB. Kirtland should explain why sanitary sewer systems for the remainder of the Base are not included in the Work Plan, or state that no other systems exist if that is the case. Kirtland should specifically address the existence or nonexistence of sanitary sewer systems in the Manzano Base area to the southeast; the Coyote Test Field area to southeast; and the Thunder Range area to the south.

2. Section 8.2.4, Sanitary Sewer B, p.1

Section 8.3.4, Sanitary System C, p.1

Kirtland states that because these SWMUs service only residential areas, no sampling and analysis will be performed. Kirtland should specify whether any portion of Sanitary Sewer B or C has ever been used for industrial purposes in the past. Kirtland should state what documentation exists to prove that these systems have never served an industrial facility. If Kirtland can document that no portion of Sanitary Sewer B and C have ever been used for industrial purposes, the EPA will approve these portions of the Work Plan.

3. Figure 8-9, Sanitary Sewer G

Kirtland should explain/justify why the proposed five (5) soil boring locations are all concentrated at the southwestern portion of Sewer G.

Miscellaneous Waste Line Sites

1. General Comment

The objective of the investigation of these miscellaneous waste line sites is to determine if there is any possible leakage/contamination along the inflow and outflow lines. Kirtland states in the Work Plan and Rationale section for each unit that the investigation shall "determine if contamination exists in the adjacent soil." This is inaccurate. Kirtland should instead state that the objective is to "determine if contamination exists in the soil adjacent to and along the inflow and outflow lines."

2. Section 9.3.4, ST-229, Building 1043 Sewage Ejector Unit Lines, p.1

Under the Stage 2B RFI Work Plan, Kirtland must determine the inflow source(s) and discharge destination of this unit. The investigation of this unit under the Stage 2C Work Plan shall determine if the lines leading to and from the unit have any possible leakage. Once Kirtland has determined the inflow and outflow points, they shall sample along these lines at 50 foot intervals.

3. Section 9.4.4, ST-232, SWMU 10-7, Building 1046, Sewage Ejector Unit Lines, p.1

Kirtland should determine the length of the discharge line for this unit. If the line length is greater than 50 feet, samples should be taken along the line at 50 foot intervals.

Editorial Comments

1. Section 4.23.1, ST-231, Building 1046, Holding Tank Lines, p.1

Kirtland states that "ST-231 receives flow from ST-230, an oil/water separator approximately 22.8 feet to the northeast..." However, the Figure 4-24 indicates that ST-230 is located 22.8 feet to the east, not to the northeast. Please correct.

2. Section 5.11.1, ST-329, Building 336, Grease Trap and Drain Lines, p.2

The reference to ST-213 is probably incorrect and should be revised to reference ST-329.

3. Section 7.3.1, Building 614, Septic Tank, Leach Field and Lines, p. 1

Kirtland states that Building 614 is located approximately 500 feet west of Septic Tank ST-288. However, Figure 7-4 indicates that the building is 500 feet north of ST-288. Please clarify.