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TO: Steve Zappe, RCRA Permitting Program

THROUGH: Steve Alexander, RCRA Technical Compliance Program Manager *→ MA*

FROM: Ron Kern, Technical Compliance Program *RAK*

DATE: February 25, 1994

SUBJECT: **Technical Review of the February 9, 1994 Post-Closure Plan for the Sewage Lagoons and Golf Course Main Pond, Kirtland Air Force Base, Albuquerque**

The Technical Compliance Program was requested by the RCRA Permitting Program to technically review the February 9, 1994 document "Post-Closure Plan Sewage Lagoons and Golf Course Main Pond", prepared by D.B. Stephens & Assoc., Inc. for Kirtland Air Force Base (KAFB).

Technical aspects of the Phase I proposal for Sampling and Analysis at the Sewage Lagoons (SL) and Golf Course Main Pond (GCMP) are adequate. The proposal for Sampling and Analysis during Phase II activities, however, is technically inadequate. Basically, KAFB discusses disposition of the sludge based upon decisions related to chromium contents of the groundwater. This is inappropriate because the sludge and the groundwater are separate media, and they must be adequately discussed independently of each other within the post-closure plan proposal (Section 6.6).

Specific technical concerns related to the anticipated scenarios for Phase II activities (Section 6.6) are detailed below:

1. Sludge:

a. KAFB must address the procedures they will implement and the disposition of the sludge (sampled and analyzed during the Phase I period) if the TCLP Chromium concentration(s) for the sludge exceeds the TCLP standard.

b. KAFB must also address what they propose to do with the sludge in the case that the TCLP Chromium standard is not exceeded, but a Health-Based Action Level (HBAL) for Chromium is exceeded.



c. KAFB is proposing to till the sludge in place to accelerate the natural soil processes of degradation. KAFB must explain how this might be beneficial for remediating or reducing any threat related to Chromium.

2. Groundwater:

KAFB is proposing only one additional year of quarterly groundwater monitoring at both the noncomplying unit(s) and, at a minimum, one background well (Section 6.6.II.A.). Nevertheless, at 40 CFR 265.117(a)(1)(i), monitoring and reporting, in accordance with the requirements of Subpart F (Groundwater Monitoring), must be continued. Subpart F [40 CFR 265.93(d)(4)] requires that KAFB must implement the Groundwater Quality Assessment Plan which leads to determination of Rate, Extent, and Concentration of Chromium in the groundwater. Additional monitoring wells may be required therefore to delineate a possible plume of Chromium contamination.

An additional comment relates to Table 4.1.3.1 (Action levels for soil) in Appendix A. KAFB must explain the source of the soil action level for Chromium total (80,000 mg/kg). Furthermore, KAFB must provide a soil action level for Chromium III in this table.

cc: Barbara Hoditschek, RCRA Permitting Program Manager