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ENTERED

FAX COVER SHEET

DATE: MAR. 4, 1994

TO: NANCY MORCOCK

COMPANY: EPA

FAX NO. 1-214-655-6660

TELEPHONE

Message: NANCY: THESE ARE THE NMED OSMOA PROGRAM'S COMMENTS ON THE KAFB STAGE 2C RFI WP. I DID NOT CHECK TO SEE IF YOU HAD COVERED SIMILAR ISSUES IN YOUR COMMENTS. THE LAST PAGE IS A LIST OF BUILDINGS IDENTIFIED IN THE RFA BUT APPEAR TO US TO HAVE NOT BEEN INVESTIGATED. HOPE THIS HELPS!

FROM: STEVE PULLEN NO OF PAGES 4 (including cover)

COMPANY: NM ENVIRONMENT DEPARTMENT-HAZARDOUS & RADIOACTIVE MATERIALS BUREAU

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Kirtland AFB IRP Stage 2C workplan comments

Non-Waste Line Investigation

Table 2-1, p. 2-26: The proposed UTL for uranium is 5.7 mg/L; the New Mexico Water Quality Control Commission regulations, section 3-103.A, provide for a maximum level of uranium in groundwater of 5.0 mg/L. Regulatory acceptance of a level higher than 5.0 mg/L as background would probably require information from more than 8 samples (4 detections). NM. - EPA Does not Reg. Raw. Better to the States Letter

Table 10-1, p. 10-3, and text on p. 10-2: Planned analyses at ST-335, the building 20681 Paint Shop, do not include volatile organic compounds. In view of the suspected contaminants (paint thinners and perhaps other solvents), VOC analyses should be done. NM Agrees.

Table 11-1, p. 11-3, and text on p. 11.4: Analyses proposed at ST-336, the Jet Engine Test Cell, should include at least BTEX compounds, both because of the nature of the contaminants (JP-4) and the BTEX ARARs contained in the NM UST regulations. NM Agrees

Waste Line Investigation

A crucial question that does not appear to have been raised in the documentation so far is whether the various facilities under investigation have always been connected to the Albuquerque sanitary sewer system, or whether some or all of the facilities may have discharged material to the storm sewer or to on-site drainage before connection to the sewer system. Obviously chances of significant environmental contamination are much greater if the facilities were in use before connection to the sewer system.

NM Agrees.

The proposal for collecting only one near-surface sample at the outfalls of the storm sewer system does not seem adequate to determine the presence of contaminants, particularly since many of the potential contaminants are volatile (solvents and fuels). Sampling should extend to some depth below ground surface, say 25 feet minimum. NM will look at WP and see what it says.

Page 3-3. Par. 5, (Soil Gas surveys may be performed ...). Vapor concentratons measured during soil vapor surveys can vary depending on how a probe hole is purged and the presence of an initial peak concentration. Discuss the procedure for quantifying the equilibrium concentrations of volatile organic compounds. This section is very brief and need to be expanded. There is no discussion of how to interpret the results of the investigation technique. What is the appropriateness of this method at sites with semivolatiles versus volatiles? What is the appropriate depth? Discuss the differences of the PID and the FID and how they might be used in the sewer system. ie. the detection of methane.

NM will check to see if WP. agrees.

Has the Stage 2B work been performed? The work plan refers to the

results to determine the number of bore holes. Perhaps the work will happen at the same time.

Any discussion of the oil recovery procedure for the oil/ water separators, ie. inspections, removals etc. The inclusion of this type of information would allow reviewers to ascertain the possibility of overflow of these units. THIS WAS WRONGLY IN GB WP. MAY ASK KATHLEEN FOR COPY OF WP.

Page 4-2. Par. 2, (If little or no contamination is ...). Define the word "little".

Field instruments will not be able to determine concentrations of the majority of the contaminants of interest. Therefore , it will be difficult to decide in the field which samples to send to the lab. Please provide a detailed description of the soils in the boring logs, including any OVM measurements, plus a visual description of the soils and justify the choice of samples for laboratory analysis. — NM will agree

Page 4-2, Par. 4, (Soil samples will be collected from ...). The work plan specifies that soil boring will be drilled to a maximum of twelve feet but does not consider the possibility of still being in contaminated soils at that depth. KAFB must eventually characterize the full vertical extent of contamination. This can be accomplished by collecting two consecutive samples at five foot intervals that show no evidence of contamination and having the lowermost sample submitted for laboratory analysis.

Is there a possibility of Pcb being in any of these units? Has the base fully documented the disposal of this material? — NAD IN SWMU 213 WP.

Page 4-29, Par. 3, (The location of the outflow ...). Is there any way to determine if the boring location is actually close to the outflow lines? the WP says that the location of the line is actually not known. I believe that metal lines can be located using electronic line locators but ceramic or other non-metal lines may be difficult to find.

— SHE WOULD PREFER NOT USE AD NOD

— SHE MAY CALL AND ASK FOR AN EXPLANATION.

— RESP. SHOULD BE READY BY MAR. 16.

Buildings identified in IRP documents of no proposed investigation:

[illegible]

BLDG #

277	Former machine shop
498	Machine shop
1000	Helicopter washrack
1018 (?)	AGE shop
1017 (?)	Helicopter maintenance
~~1002~~	~~Former C-130 maintenance, & other activities~~
1009	C-130 shop
?	Fuel Test Cell (near ST 217/218; Bldgs. 481/482)
~~1046~~	~~Corrosion Control~~

- NANCY THINKS SOME OF THESE HAVE BEEN INVESTIGATED
- ASK CHRIS DRUITT.
- INFORM NANCY.
- MAY HAVE DROPPED OFF RPA LIST.

Is there any separate discharge for bldg 20341 (Maintenance shop); — adjacent to bldg. 20338 (ST 250)?

20684/85	Pesticide shop
20687	Fuel maintenance
~~20681~~	~~Paint shop of rock bed, Paver Production's~~ — ST [illegible] 335 —