



KAFB 94

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



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4 April 1994

377 ABW/EM
2000 Wyoming Blvd SE
Kirtland AFB NM 87117-5659

Ms. Barbara Hoditschek, Project Manager
New Mexico Environment Department
Hazardous and Radioactive Materials Bureau
525 Camino de los Marquez, Ste 4
Santa Fe NM 87502

Dear Ms. Hoditschek

In a 24 January 1994 letter to EPA Region 6 (Atch 1), we asked to establish a separate Appendix IV, to include Radioactive Waste Disposal Sites RB-7 (now in Appendix III) and RB-11 (now in Appendix II). In their 26 January 1994 response (Atch 2), EPA approved the formation of Appendix IV. The RFI report for RB-11 and RB-7 will be submitted to the EPA by 31 December 1994.

In a 24 June 1993 letter to EPA (Atch 3), we asked the EPA to remove RB-4, RB-5, RB-6, RB-8, and RB-9 from our RCRA permit, as there are no records showing use of these tanks, which are part of an Area of Concern in Appendix II. In their 7 February 1994 response (Atch 4), EPA denied this request.

In an 11 March 1994 letter to EPA (Atch 5), we requested the five tanks be added to the new Appendix IV to be investigated on a separate schedule, with a work plan completed by 31 May 1994. The EPA approved this proposal pending a Class I modification to our permit (Atch 6).

If you have any questions, please contact Mr. Chris DeWitt, (505) 846-2773/0053.

Sincerely

THOMAS A. NORRIS, Colonel, USAF
Director
Environmental Mgmt Division

Attachments:

1. 377 ABW/EM Ltr, 24 Jan 94
2. EPA Ltr, 26 Jan 94
3. 377 ABW/EM Ltr, 24 Jun 93
4. EPA Ltr, 7 Feb 94
5. 377 ABW/EM Ltr, 11 Mar 94
6. EPA Approval

KAFB1393





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

P 079 613 882

377 ABW/EM
2000 Wyoming Blvd, SE
Kirtland AFB, NM 87117-5659

24 Jan 94

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

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 include 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


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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

JAN 26 1994

George K. Pratt, Lt. Colonel, USAF
Deputy Director, Environmental Management Division
377 ABW/EM
2000 Wyoming Boulevard SE
Kirtland Air Force Base, New Mexico 87117-5659

RE: Radioactive Burial Sites

Dear Lt. Colonel Pratt:

The Environmental Protection Agency (EPA) has reviewed your letter dated January 24, 1994 concerning the investigation of radioactive burial sites RB-11 and RB-7 contained within the Appendix II and III RFI Work Plans, respectively. In summary, Kirtland Air Force Base (Kirtland) has proposed creating a new appendix (Appendix IV) for the investigation of these potentially radioactive sites. Kirtland has agreed to submit the RFI Report detailing the investigation of RB-11 and RB-7 by December 31, 1994.

Because Kirtland's proposal will result in an expedited investigation for RB-7 (by approximately one year) and will not delay the investigation of RB-11, the EPA is willing to approve the formation of Appendix IV. Kirtland has requested that the EPA review and approve the work plan for RB-7 by February 28, 1994. Because the EPA has not yet received the work plan for RB-7, we cannot comment as to the feasibility of issuing an approval by February 28, 1994. We will, however, make every attempt to complete our initial review prior to your requested February 28, 1994 deadline.

Should you have any questions or require additional information, please contact the undersigned at (214) 655-6650.

Sincerely yours,

Nancy R. Morlock
Environmental Engineer
RCRA Permits Branch (6H-PN)

cc: Benito Garcia, NMED



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

Mr William Honker
Chief, RCRA Permits Branch
US Environmental Protection Agency, Region VI
1445 Ross Avenue
Dallas Texas 75202-2733

JUN 24 1993

Dear Mr Honker

In accordance with the requirements of 40 CFR 270.42, Kirtland Air Force Base (KAFB) requests your consideration of a Class III change to our Permit Number 95700Z4423.

The legal notice for the required public meeting announces the date, time and place (Atch 1). The public notice (93-1) specifies the modifications being requested (Atch 2). Notifications of this request for a Class III permit modification will be distributed and published in major local newspapers of general circulation, as required in 40 CFR 124.10 (c)(ix). Any public comments submitted to your and/or our offices should be added to the record for this Class III change. The transcript from the public hearing will be forwarded to your office for review. KAFB will await your decision of this review. Background information of the subject sites are Atch 1-12 of the public notice.

If you have any questions or wish to comment on the material as submitted, please contact Mr Harry Davidson, (505) 846-2773. We propose to publish the legal notice on or about 6 July 1993. Any revisions you deem appropriate should be submitted to this office by 2 July 1993.

THOMAS A. NORRIS, Colonel, USAF
Director
Environmental Management Division

2 Atch
1. Legal Notice
2. Public Notice, w/12 Atch

LEGAL NOTICE
377th AIR BASE WING
ENVIRONMENTAL MANAGEMENT DIVISION
(377 ABW/EM)
2000 WYOMING BLVD SE
KIRTLAND AIR FORCE BASE, NEW MEXICO 87117-5659

Public Notice No 93-1

June 1993

NOTICE OF REQUEST FOR A CLASS III MODIFICATION
TO THE HAZARDOUS WASTE PERMIT PART B FOR
KIRTLAND AIR FORCE BASE (95700Z4423)

1. The 377 ABW requests the following modifications:
 - a. Delete from Appendix I solid waste management units (SWMUs):
 - 6-8 Landfill C
 - 10-4 Underground Storage Tank T-02413
 - 10-5 Underground Storage Tank T-02412
 - b. Delete from Appendix II:
 - 6-A Radioactive Burial Sites
 - RB-4
 - RB-5
 - RB-6
 - RB-8
 - RB-9
 - 6-C Mining Shafts
 - RW-48
 - RW-49
 - RW-50
 - c. Delete from Appendix III:
 - 6-B Dirt Mounds
 - WP-53
 - WP-54
 - WP-55
 - 6-E Rocket Impact Zone
 - d. Add to Appendix II:
 - 6-16 Manzano Fire Training Pit FT-14
 - e. Add to Appendix III:
 - ST-273, Septic Tank, Bldg 618 (north)
 - ST-338, Horizontal Dipole Drum Rack
 - ST-337, US Corps of Eng Vehicle Maint Yard, Bldg 20212
 - WP-339, Contract Yard W of Bldg 20423
 - ST-340, Septic Tank, Bldg 57011
 - ST-341, Condensate Tank, Bldg 1032



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

FEB 07 1994

Thomas A. Norris, Colonel, USAF
Director, Environmental Management Division
377 ABW/EM
2000 Wyoming Boulevard SE
Kirtland Air Force Base, New Mexico 87117-5659

RE: Investigation of Radioactive Burial Sites

Dear Colonel Norris:

The Environmental Protection Agency (EPA) has reviewed the information submitted by Kirtland Air Force Base (Kirtland) supporting their Class III Permit Modification request. Based upon the information submitted, and based upon subsequent conversations with members of your staff, the EPA has determined that Radioactive Burial Sites RB-4, RB-5, RB-6, RB-8 and RB-9 should not be removed from Kirtland's permit. The EPA understands that although these tanks were never used for their intended purposes, they were recently surveyed and several were found to contain free liquids.

The EPA has therefore removed these SWMUs from Kirtland's permit modification request. These SWMUs should be investigated by Kirtland in accordance with their permit.

Should you have any questions or require additional information, please contact Nancy R. Morlock of my staff at (214) 655-6650.

Sincerely yours,

David W. Neleigh, Chief
New Mexico and Federal Facilities Section
RCRA Permits Branch (6H-PN)

cc: Benito Garcia, NMED



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

11 March 1994

377 ABW/EM
2000 Wyoming Blvd SE
Kirtland AFB NM 87117-5659

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

Dear Ms. Morlock

In our 24 January 1994 correspondence to you, we requested a separate appendix (Appendix IV) be established with sites to be investigated using the same time schedule as Appendix II. These sites included Radioactive Waste Disposal Sites RB-7 (presently included in Appendix III) and RB-11 (presently included in Appendix II). Your agency responded via a 26 January 1994 letter, granting approval for the formation of Appendix IV to investigate these potentially radioactive sites. It was further agreed that the Stage 2D RFI report detailing the investigations of RB-11 and RB-7 would be submitted to the agency in draft final form by 31 December 1994.

Five emergency holding tanks located on Manzano Base are listed in the RCRA Permit as Areas of Concern (AOCs). These tanks, identified as RB-4, RB-5, RB-6, RB-8, and RB-9, were designed and constructed as holding tanks to collect potentially radioactive discharges in the event of an accident. Reportedly, these tanks were never used. In a 24 June 1993 letter, KAFB requested that, due to the tanks never being used for their intended purposes, they be removed from the permit. In your 7 February 1994 response, your agency determined that these five tanks should not be removed from the permit. Kirtland AFB therefore suggests these tanks be investigated as AOCs and added to the Appendix IV sites.

Your agency has accepted the Stage 2B Work Plan for RB-11; the Stage 2C Work Plan for RB-7 is presently being reviewed, with the RB-7 portion of the work plan receiving your informal approval. The schedule agreed upon for the submission of the RFI report for RB-11 and RB-7 is 31 December 1994. We suggest the five holding tanks be investigated on a separate schedule. If agreeable with your office, an Appendix IV Work Plan will be



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

DATE REC'D int
30 Mar 94

MAR 23 1994

Thomas A. Norris, Colonel, USAF
Director, Environmental Management Division
377 ABW/EM
2000 Wyoming Boulevard SE
Kirtland Air Force Base, New Mexico 87117-5659

Dear Colonel Norris:


The Environmental Protection Agency has reviewed your letter dated March 11, 1994 requesting that RB-4, RB-5, RB-6, RB-8, and RB-9 be added to Appendix IV/Stage 2D-2. The following comments are offered in response to your letter:

1. The five (5) emergency holding tanks located on Manzano Base are listed in Appendix II of your RCRA permit. A Class 1 permit modification is therefore required to remove the holding tanks from Appendix II and add them to Appendix IV /Stage 2D-2.
2. The due date for RFI Work Plan detailing the investigation of the holding tanks shall be May 31, 1994.
3. The due date for the draft RFI Report for the holding tanks shall be 12 months following approval of the RFI Work Plan.

As a reminder, please ensure that the New Mexico Environment Department is copied on all correspondence relating to Kirtland's permit.

Should you have any questions or require additional information, please contact Nancy R. Morlock of my staff at (214) 655-6650.

Sincerely yours,


David W. Neleigh, Chief
New Mexico and Federal Facilities Section
RCRA Permits Branch (6H-PN)

cc: Benito Garcia, NMED