



UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Ecological Services

Suite D, 3530 Pan American Highway, NE
Albuquerque, New Mexico 87107

May 25, 1994

Ms. Barbara Hoditschek
Program Manager, RCRA Permit Section
New Mexico Environment Department
P.O. Box 26110
Santa Fe, New Mexico 87502

Dear Ms. Hoditschek:


We have reviewed the fact sheet regarding a post-closure plan for sewage lagoons and golf course main ponds that the New Mexico Environment Department has proposed to issue to Kirtland Air Force Base (KAFB) in Albuquerque, New Mexico. We understand that a decision on what final remediation/closure action(s) will be required for these sites will depend upon the results of chromium assays in samples of groundwater and desiccated sludge.

We urge you to consider the ecological as well as human-health implications related to closure of these sites. From the standpoint of protecting wildlife from potentially toxic metals and other contaminants that may be associated with the desiccated sludge, the Fish and Wildlife Service recommends either removing the sludge and transporting it to an approved hazardous waste disposal facility, or covering the sludge with clean fill material, grading the berms surrounding the lagoons to blend with the surrounding topographical contours, capping the fill with topsoil and reseeding it with a mixture of native vegetation of high wildlife habitat value.

The golf course main pond in particular, might be appropriate for development as a wildlife habitat display, or nature study area in conjunction with the closure activities recommended above. The Fish and Wildlife Service would be happy to provide technical assistance to the staff at KAFB in order to help them design an educational wildlife habitat project suitable for incorporation into closure activities connected with the sewage lagoons and golf course main pond.

Please telephone Mark Wilson at (505) 883-7877 if you have any questions regarding the comments contained in this letter. Thank you for the opportunity to review and comment on this draft permit.

Sincerely,



Jennifer Fowler-Propst
State Supervisor

cc:
New Mexico Department of Game & Fish, Conservation Services Division, Santa Fe,
New Mexico

