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**MEMORANDUM**

TO: Kathleen Sisneros, Director WWM Division

FROM: Steve Zappe *SZ*

DATE: June 29, 1994

SUBJECT: Your questions on Response to Comments, KAFB Sewage Lagoons and Golf Course Main Pond Post-closure Care Plan

Ron Kern and I decided to answer some of your questions concerning validity of previous analytical data in this separate memorandum, since they deal with issues not directly raised by the commentors. We believe your other questions are adequately addressed by modifying the response. I've highlighted modifications in the text with yellow.

Questions related to Response to Comment #1:

"Has NMED done any sampling? If not, why not? How can we proceed if the data are not valid?"

HRMB has no record that NMED previously acquired samples of dry sludge and/or subsurface soils from the SLs and GCMP. In a recent re-evaluation of analytical data from the SLs and GCMP, HRMB recognized that only the original data (December, 1990) for total chromium (Cr) in dry sludge from the SLs and in dry pond sediments from the GCMP were suspect because the corresponding QC data were unacceptable. The majority of the previous analytical data, however, for subsurface soils and groundwater from these two units had acceptable QC data and is therefore valid. Additionally, previous EP Toxicity data for metals and pesticides were valid and indicated that the sludge did not exhibit the characteristic of toxicity. Nevertheless, as part of the currently proposed Phase I sampling and analysis plan of the post-closure plan, KAFB is required to resample the dry sludge for current characterization purposes. Sludge samples will be analyzed for TCLP Cr, total Cr, and Cr VI.

The AIP Program, GWPRB, and HRMB have previously sampled the groundwater from monitoring wells at the SLs and GCMP. Additionally, HRMB conducted a Comprehensive Groundwater Monitoring Evaluation (CME) during August, 1990; a CME is scheduled currently for these two units during this week.

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Question related to Response to Comment #3:

*"Why (is Cr currently the only contaminant of concern)?"*

HRMB has reviewed all available analytical data related to the SLs and GCMP. With reference both to health-based action levels (soils) calculated within proposed Subpart S and NMWQCC MCLs, only Cr was either detected or occurred at concentrations considered significant. Additionally, groundwater samples from the SLs and GCMP have been analyzed for Appendix IX constituents by NMED and KAFB (as part of KAFB's assessment monitoring program). Cr has been the only hazardous constituent detected in the groundwater at these sites. Based upon all available analytical data, HRMB has determined currently that Cr is the only constituent of concern.

Question related to Response to Comment #5:

*"Are you saying the original data wasn't any good?"*

The original data were valid, with the exceptions stated previously. Mr. Silva's concern was related to his premise that NMED originally calculated a higher concentration of 1,1,1-trichloroethane than had presumably been discharged to the SLs. KAFB, however, recognized that these were regulated units and prepared closure plans, which were approved by NMED in November 1991. In the last sentence of Response to Comment #5, we replaced "developed reliable data" with "provided reliable data" to prevent the misconception that **all** original data were unreliable.