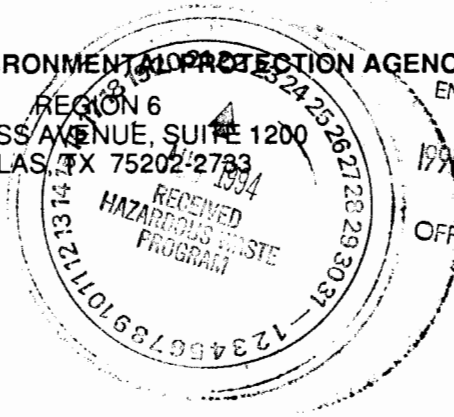




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2783



NEW MEXICO ENVIRONMENT DEPARTMENT

1994 AUG 15 AM 11:10

OFFICE OF THE SECRETARY

*Davis*  
ENTERED

*for K*  
*Barlow*  
*Steve P.*

*XIII*

AUG 11 1994

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

Dear Colonel Norris:

The Environmental Protection Agency (EPA) hereby approves your Stage 2D-2 RCRA Facility Investigation Work Plan for the Emergency Holding Tanks, dated May 27, 1994, RFI with the attached list of modifications.

The approved RFI Work Plan shall be implemented in accordance with the project schedule contained in Section 8.0. The draft RFI Report shall be due 18 months after the date of this approval letter.

Please contact Nancy Morlock of my staff at (214) 665-6650 if you have any questions or need additional information.

Sincerely yours,

*WK Davis*  
Allyn M. Davis, Director  
Hazardous Waste Management Division

cc: Ms. Kathleen Sisneros, Director  
New Mexico Environment Department

Enclosure



**Approval with Modifications  
Kirtland Air Force Base  
Stage 2D-2 RFI Work Plan**

1. The EPA is not approving Table 2-2, *Upper Tolerance Limit for Background Groundwater Samples*, or Table 2-3, *Upper Tolerance Limits for Soil Samples*. This data was submitted in the draft Stage 2A RFI Report, which is currently being reviewed by the EPA and the New Mexico Environment Department.
2. Section 2.5, Health and Environmental Assessment and ARARs  
The EPA will not conduct a formal review of this section as risk assessments are not a requirement of a RCRA facility investigation. However, if Kirtland chooses to conduct a voluntary risk assessment, the EPA recommends that residential land use be considered until stakeholder input can be incorporated into future land use scenarios.
3. Sections 3.4, 4.4, 5.4, 6.4 and 7.4, Work Plan and Rationale
  - a. Kirtland states that "The objective of the investigation at [each tank] is to determine if the tanks could have released contamination to the adjacent soil." However, the objective of an RFI investigation is to determine the nature and extent of releases of hazardous waste or hazardous waste constituents. Kirtland shall revise this sentence in each section to reflect the actual objective of an RFI.
  - b. Kirtland shall complete both the Phase 1 and Phase 2 investigations, regardless of the Phase 1 sampling results. The Phase 1 samples include four surface soil samples and three samples from the contents of each tank. The second phase shall include the installation of a soil boring at each of the four tank corners as follows:
    - The borings shall be completed 10 feet below the bottom of the tankhole fill or until field screening indicates no contamination for two successive soil samples, whichever is greater.
    - Samples shall be collected at the bottom of the tank and at five foot intervals thereafter.
    - Samples shall be analyzed for gross alpha, gross beta, gamma spectrometry, metals, VOCs and tritium.

The draft RFI report shall be submitted at the conclusion of the second phase investigation. No report shall be submitted at the conclusion of the Phase 1, as was proposed in the Work Plan.

- c. Soil samples shall be collected at the discharge point of the 6" outlet pipe for RB-04 and RB-08. Samples shall be collected at the surface and at depths of 2', 5' and 10' below grade, or where field screening indicates contamination.
4. Additional soil borings and/or groundwater monitoring wells may be required pending the results of the investigation.