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ENTERED

Mark E. Weidler  
Secretary

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Deputy Secretary

FAX COVER SHEET

DATE: 6/9/95  
TO: Nancy Morelock  
COMPANY: ZPA  
FAX NO. 9-1-214-665-6660  
TELEPHONE \_\_\_\_\_

Message: Nancy, I'm sending those draft comments  
for your review. I'll probably be finalizing these  
and sending them both to ZPA for inclusion and  
KAFB for consideration. I'll be in the office  
Monday until 2 pm. Call me with any response.  
THANKS, Dave

FROM: Dave Paxon NO OF PAGES 3  
(including cover)

COMPANY: NM ENVIRONMENT DEPARTMENT-HAZARDOUS & RADIOACTIVE MATERIALS BUREAU

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- Will begin review of other SWS issues immediately.



①  
Comments regarding Kirtland AFB's various proposals and the associated EPA responses.

In general KAFB's May 26, 1995 "site-specific" sampling plans need more specificity. Two major problems exist: First is the lack detail regarding the source characterization. The Cratering Area description need elaboration. Second is the absence of specific references for activities such as; choosing sampling locations (both on-site and background), what field screening results would trigger VOC analyses,

RW-68 (Radium Slag Piles)

NMED believes that KAFB should identify what criteria it proposes to use to determine when the extent of contamination has been fully delineated?

NMED considers contaminant delineation complete when contamination has been measured to "action levels" in all direction from a release source. The Subpart S action levels stipulated in 55FR30798 (27 July 1990) are generally dated and may not be determined with the most currently accepted toxicological/epidemiological information used to calculate reference doses or carcinogenic slope factors. NMED prefers the more current "Risk Based Concentration (RBC) Table", which is guidance published by EPA Region III.

RW-68 (Cratering Area)

KAFB should provide additional information regarding the depths at which the test explosions occurred and justify a surface investigation of a subterranean contaminant source.

KAFB should explain why it is planning to sample for gross alpha/beta at these locations.

The "previous investigations" portion of this report suggests that there is a potential for unexploded ordnance to be present at this site. Does KAFB propose to verify this potential?

What criteria will KAFB use to determine where the five "other" grab samples and the one background samples will be collected? Is this criteria discussed in either the Stage 2C Plans or the Base Wide Generic Plan, and if so where?

Is there a statistical basis for the sampling plan associated with this site?

SS-69 (Drum Storage Area)

Please provide any internal (Air Force) requirements for the investigation and remediation of the radioactive portion of these wastes.

Please elaborate on the following issues:

... ②

- The sentence describing a number of deteriorated drums and releases to the environment. Is there a report associated with the Compliance Branch's activities at this site and could it be provided?

- The criteria to be used to locate on-site and background sampling locations.

- What is meant by boreholes "driven by direct push methods"?

- Sampling action b. talks about soil sample location being up and down gradient. What is the relevance of "gradient" in relation to soil sampling?