



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Ground Water Protection and Remediation Bureau
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2918 phone
(505) 827-2965 fax

Steven P. ✓
R. K. ✓
MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

September 25, 1995

Scott E. Streifert, Colonel, USAF
Director, Environmental Management Division
377 ABW/EMR
2000 Wyoming Boulevard SE
Kirtland Air Force Base, NM 87117-5659

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RE: Solid Waste Management Units (SWMUs) Draft Sampling and Analysis Plan", August 1995

Dear Col. Streifert:

The New Mexico Environment Department (NMED) Defense State Memorandum Of Agreement (DSMOA) staff have reviewed the report mentioned above and offer the following comments.

General Comments:

1. The Human Health Risk Based Action Levels columns located within all Summary of Reportable Concentrations... tables refer to the RCRA Subpart S Proposed Rule Action Levels (55 FR 30814, 7/27/90). These listings are incomplete (and possibly dated) and should be calculated for all detected constituents by the method outlined in Appendix D of Subpart S using the most recent toxicological data.

Additionally, in most cases, NMED also refers to the U. S. EPA Region III Risk Based Concentration (RBC) table (copy attached). Region III updates these concentrations every six months. Please contact them to be added to their mailing list. After a site is adequately characterized, if it meets the seven criteria described in the RBC table, then it may be considered for no further action, especially for soils. If a site is adequately characterized, and either the Subpart S screen levels are exceeded, excluding constituents shown to be naturally occurring background, or the site does not meet the seven criteria, then a baseline risk assessment should be performed. Furthermore, any other Applicable, Relevant, & Appropriate Requirements (ARAR's) such as New Mexico Water Quality Control Commission (WQCC) standards or Safe Drinking Water Act MCL's, whichever are lower, for ground water will take precedence.

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2. Because of the proximity of local production wells and depth of contamination in general, it is important to know how often these wells are sampled and for which constituents. For example, how often are volatiles, semivolatiles, metals, nitrate/nitrite and water chemistry parameters sampled for?
3. What is the decision logic in determining the need for ground-water monitoring and investigation at these sites?
4. DSMOA staff, should be notified a week prior to field activities, in order to schedule site field visits and possibly collect split samples.
5. It is our understanding that there is a combined effort between KAFB and Sandia National Laboratories to determine background concentrations for naturally occurring metals. If these new background concentrations are different from those used for comparison in this report, then another comparison should be made using these new values.

Specific Comments:

1. Section 6.0 ST-219 Oil/Water Separator. It is recommended that borehole ST-219B-27 be located closer to 219-09.
2. Section 6.0 ST-219 Oil/Water Separator. The depth and concentrations of organic solvents and hydrocarbons at ST-219 may indicate the need for ground-water monitoring wells. What is the decision logic in determining the need for ground-water monitoring and investigation at this site?
3. Section 12.0 Site ST-265 Oil/Water Separator. Because of proximity of local faulting, it is likely that the ground-water depth is much shallower than estimated. Rather than estimating this depth, please provide more specific data for determining ground-water depth. KAFB may consider measuring the depth to ground water at the nearest production or other wells to this site.
4. Section 13.0 Site ST-266 Area Drain. Because of proximity of local faulting, it is likely that the ground-water depth is much shallower than estimated. Rather than estimating this depth, please provide more specific data for determining ground-water depth. KAFB may consider measuring the depth to ground water at the nearest production or other wells to this site.
5. Section 14.0 Sites ST-271 and ST-272, Neutralization Pit and Evaporation/Infiltration Pond respectively. Because of the

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past use of neutralizing compounds which may have contained chloride, sulfate, and nitrate, all regulated under the WQCC regulations, are there any analyses for these constituents in nearby production wells, especially near landfill #1.

Please do not hesitate to call me at 827-2754 if you have any questions or if I can be of any assistance in this matter. I would appreciate knowing your response to these comments. If you concur, a copy of the revised workplan is adequate; if you disagree with the comments or believe an alternative approach is preferable, please let me know as soon as possible.

Sincerely,



Lee Winn
Environmental Specialist, DSMOA
Ground Water Protection and Remediation Bureau

CCw/o attachment:

Chris DeWitt
Barbara Hoditschek, NMED HRMB
Ronald A. Kern, NMED HRMB
Garth Graves, NMED Dist. I
Rich Mayer, U.S. EPA, Region VI