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Ground Water Protection and Remediation Bureau

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December 5, 1995

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

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RE: Final - March 1995 Kirtland Air Force Base-Wide Plans for the Installation Restoration Program

Dear Col. Streifert:

The New Mexico Environment Department (NMED) Defense State Memorandum of Agreement (DSMOA) staff have reviewed the above mentioned plan and commend Kirtland Air Force Base (KAFB) for its effort to streamline the environmental restoration (ER) process by proposing this "Base-wide Plan". However, NMED considers the plan deficient in a number of regards and would like to offer the following general and specific comments which we feel will make the plan more comprehensive and may ultimately make KAFB's ER effort more efficient, particularly in regards to regulatory involvement.

General Comments:

The Base-wide Plan could be considerably more comprehensive if it covered more than just the RCRA Facility Investigation (RFI) process and if it made less use of the technique of referencing guidance documents. The data management portion of the plan states that the Plan pertains to all environmental restoration issues, including corrective measures. In fact, the Plan only outlines the investigation requirements specified in KAFB's RCRA/HSWA permit. It is not clear why KAFB chose to limit the coverage of the Plan.

Referencing multiple guidance documents, as is done on Table 4-1, instead of specifying processes, is a problem in that guidance documents may be contradictory, dated, inaccessible and for practical purposes do not really constitute a plan. Furthermore, referencing multiple guidance documents, some of which are unrelated to the RCRA or the New Mexico (NM) Water Quality Control Commission (WQCC) Regulations, makes it difficult to give regulatory concurrence to the Plan. Instead of referencing other documents, NMED would prefer that KAFB elaborate within the Base-wide Plan upon the following activities:

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- the applicable or relevant and appropriate requirements (ARARs), including the NM WQCC Regulations and the state's Solid Waste Management Regulation
- how to initially identify a set of possible contaminants to be analysed for at a site
- how to determine which of the contaminants present at a site would be contaminants of concern (COC)
- the action levels KAFB proposes to use to trigger various actions
- the methodologies used to determine sample locations
- how to identify potential receptors
- the identification of inorganic background concentrations
- the criteria that would trigger a full baseline risk assessment
- the criteria KAFB would use to propose no further action (NFA) at a site.

As KAFB is undoubtedly aware, many of the above responsibilities, particularly the NFA decision, ultimately resides with the regional Administrative Authority as stipulated in the HSWA Module of KAFB's RCRA Part B Permit. But NMED believes that if the above issues could be coordinated with the regulatory authorities and stipulated in the Base-wide Plan, it would make the plan ultimately more useful.

Specific Comments:

1. Volume II Data Collection Quality Assurance Plan, Part I, Field Sampling Plan, Section 4.1.2 Determination of Sample Locations, page 4. Collecting representative samples in both horizontal and vertical planes is a crucial part of the investigative process. It is suggested that KAFB elaborate on these four approaches providing the statistical equations and associated assumptions related to each statistical sampling approach.
2. Volume II Data Collection Quality Assurance Plan, Part I, Field Sampling Plan, Section 4.2.1, Kirtland AFB Site Samples, page 4. In an effort to expedite reviewing data, it is suggested that the KAFB identification numbers be placed on these data pages and not simply cross-referenced in a separate table.
3. Volume II, Data Collection Quality Assurance Plan, Part I, Field Sampling Plan, Appendix A SOP A3.7 Aquifer Testing, page 1. Because of the heterogeneous nature of the aquifer and the faulting and fracturing in this area, it is important that aquifer testing be conducted using an aquifer pumping test and preferably a multiple-well aquifer pumping test to determine hydraulic parameters of the aquifer.

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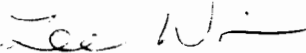
4. Volume II, Data Collection Quality Assurance Plan, Part I, Field Sampling Plan, SOP A1.17 Field Filtration. page 1. Unfortunately there is a discrepancy between the RCRA/HSWA proposed requirements and the NM WQCC regulations regarding the filtration of groundwater analytical samples. The NMED Hazardous and Radioactive Materials Bureau (HRMB), in the oversight of RCRA/HSWA corrective action, uses the logic presented in EPA's Groundwater Monitoring Technical Enforcement Guidance Document (TEGD) to require unfiltered samples. The NMED Ground Water Quality Bureau (GWQB), following NM WQCC 3103, requires that all metals samples should be filtered except for mercury, which should not be filtered. Pursuant to both RCRA/HSWA and NM WQCC, KAFB may have to collect and analyse both filtered and unfiltered groundwater samples.

It is also important to sample for water chemistry constituents such as sulfide, chlorides and nitrate/nitrite.

5. Volume II, Data Collection Quality Assurance Plan. Part II Quality Assurance Project Plan, Section 13.2 Field Measurements, page 2. Once again, how will field data completeness be determined?
6. Volume IV, Site Safety and Health Plan. Because DSMOA staff do not review Site Safety Plans for adequacy, the responsibility and liability for operations relating to worker health and safety rests solely with KAFB pursuant to 29 CFR 1910.120.
7. Volume V, Waste Management Plan, Section 5.2 Drill Cuttings, page 1. KAFB should never create a preferential pathway for contaminant migration by placing drill cutting back down a borehole.

Please do not hesitate to call me at 827-2754 if you have any questions of if I can be of any assistance in this matter. I would appreciate knowing your response to these comments.

Sincerely,



Lee Winn, DSMOA

CC: Chris DeWitt
Barbara Hoditschek, NMED HRMB
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