Rou K
Steve P
DSMOA file

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 377TH AIR BASE WING (AFMC)

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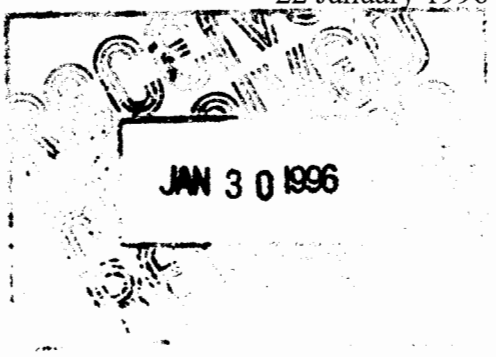
22 January 1996



377 ABW/EMR
2000 Wyoming Blvd SE
Kirtland AFB NM 87117-5659

Mr. Stephen Pullen, DSMOA
Hazardous & Radioactive Materials Bureau
New Mexico Environment Department
2044A Galisteo
Santa Fe NM 87505

VII

Dear Mr. Pullen

Enclosed are two documents: 1) Response to NMED's Comments on the Stage 2D-1 RFI Report and 2) the Interim Corrective Action Plan for Soil Removal at SWMU 6-32 (Manzano Fire Training Area [FT-14]).

We are also including a copy of our response to the EPA's NOD comments on the Stage 2D-1 RFI Report.

Please note: We do not plan to issue a revised Stage 2D-1 RFI Report until after the joint SNL-KAFB background study is complete. This will save time and money by not duplicating efforts between our contractor and SNL. Please advise me if you do not agree with this approach.

Please contact me at (505) 846-0053 if you have any questions.

Sincerely

CHRISTOPHER B. DEWITT, R.P.G
Chief, Restoration Branch
Environmental Management Division

Attachments:
1. Response to Comments
2. ICA Plan, SWMU 6-32

cc:
EPA Region 6 (Ms. Morlock)
(atchs under separate cover)

KAFB1719

INTERIM CORRECTIVE ACTION PLAN

FOR SOIL REMOVAL AT

SWMU 6-32, MANZANO FIRE TRAINING AREA (FT-14)

OBJECTIVE

The objective of this effort is to remove and stabilize surface and shallow subsurface soil containing lead at concentrations above the Human Health Risk Based (HHRB) action level at the Manzano Fire Training Area.

BACKGROUND

Soil sampling was conducted during the Appendix II RCRA Facility Investigation (RFI) at solid waste management unit (SWMU) 6-32 (USAF, 1995a). Lead concentrations exceeded the 400 mg/kg HHRB action level in surface and shallow subsurface soil in both the western and eastern fire training pits at this site. Lead is present in the soil because fire training exercises using leaded fuels were conducted at this site (USAF, 1995b).

In the western and eastern fire training pits (Figure 1), analytical results indicate lead concentrations above the HHRB action level in the shallow (0 to 0.2 ft below grade) soil. Additional characterization was recommended in the Appendix II Phase 2 RFI to define the vertical extent of total petroleum hydrocarbon contamination in the two pits (USAF, 1995a).

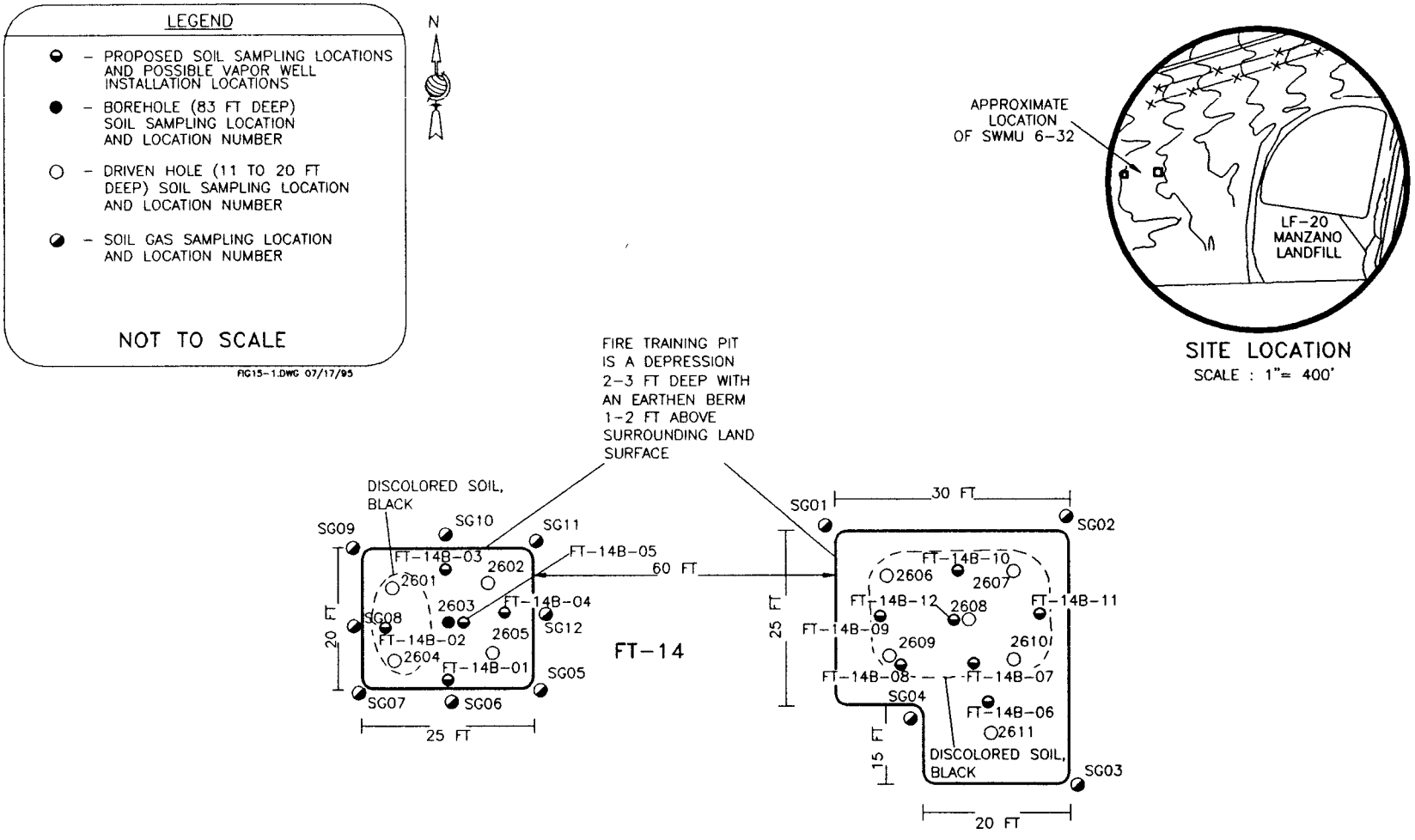


Figure 1. Soil Sampling Locations At SWMU 6-32, Manzano Fire Training Area (FT-14)

INTERIM CORRECTIVE ACTION PLAN

Soil Removal

As an Interim Corrective Action for SWMU 6-32, Kirtland AFB proposes to sample, excavate, and stabilize the lead-contaminated soil. Approximately 100 cu yd will be excavated from the upper 1 ft of soil in the western pit and only a portion of the soil will be excavated from the eastern pit (Figure 2). The excavated soil will be treated with a bulk-mixing procedure including stablization and solidification. The treated soil will remain onsite until additional sampling is conducted to determine if it can be disposed of in the Kirtland AFB landfill.

After excavation, each pit will be sampled to ensure that the remaining soil is below the lead HHRB action level. The pits will be sampled based on a 10-ft isometric, hexagonal grid (Figure 3); the starting node will be in the center of the pits. Sampling locations will branch out 120 degrees radially, 10 ft from the first sampling point, until the pit is covered by the sampling grid. EPA Method 6110 will be used to analyze the samples for lead. If the analytical results indicate that the soil is not below the lead HHRB action level, excavation and sampling will continue until all soil with elevated lead concentrations is removed.

REFERENCES

USAF, 1995a. *Installation Restoration Program (IRP) Phase 2 RCRA Facility Investigation (RFI) for Appendix II Solid Waste Management Units (SWMUs), Draft Sampling and Analysis Plan*, Kirtland Air Force Base, Albuquerque, New Mexico. August 1995.

USAF, 1995b. *Stage 2B Final RCRA Facility Investigation Report*, Kirtland Air Force Base, Albuquerque, New Mexico. July 1995.

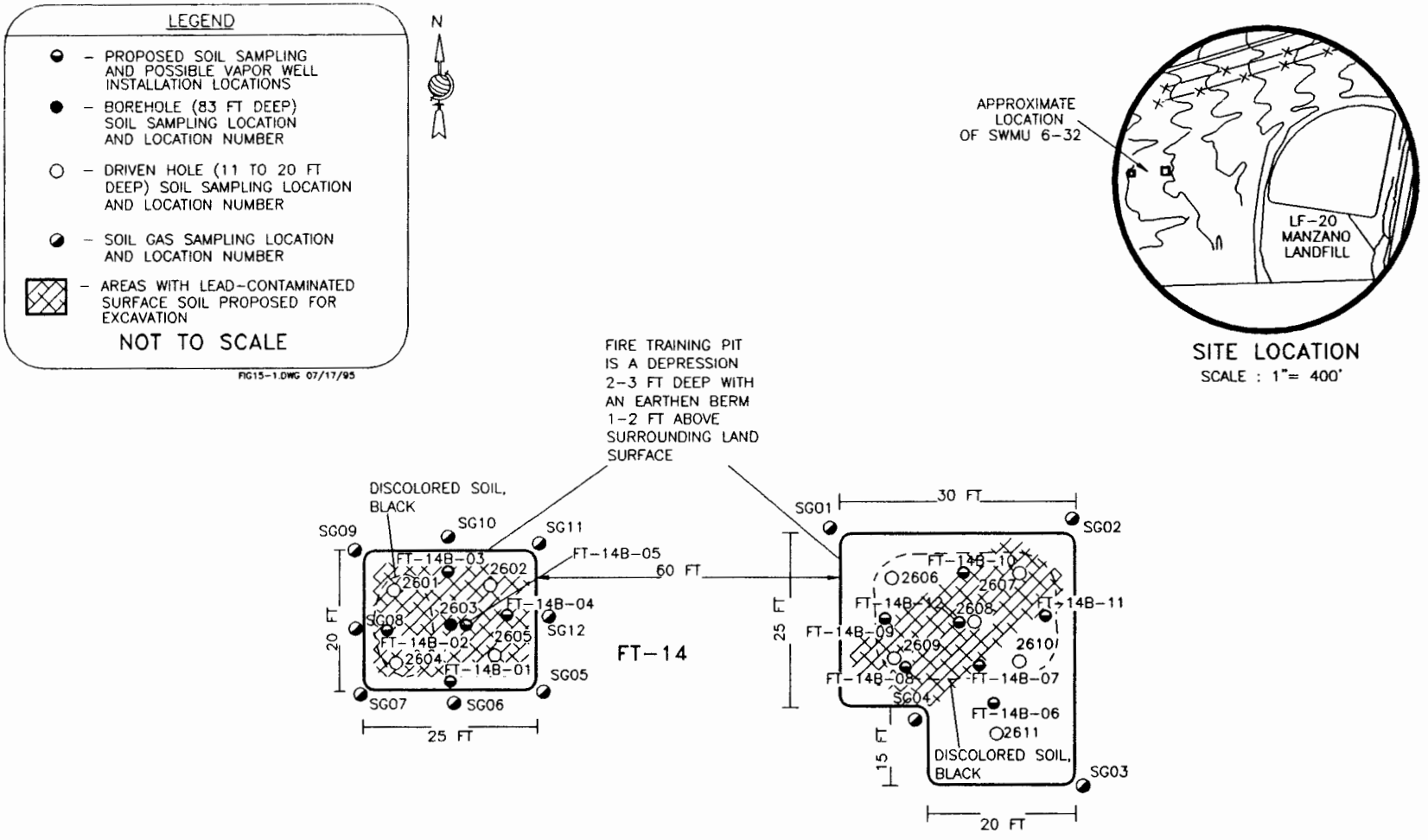


Figure 2. Areas With Lead-Contaminated Surface and Shallow Subsurface Soil Proposed for Excavation at SWMU 6-32, Manzano Fire Training Area (FT-14)

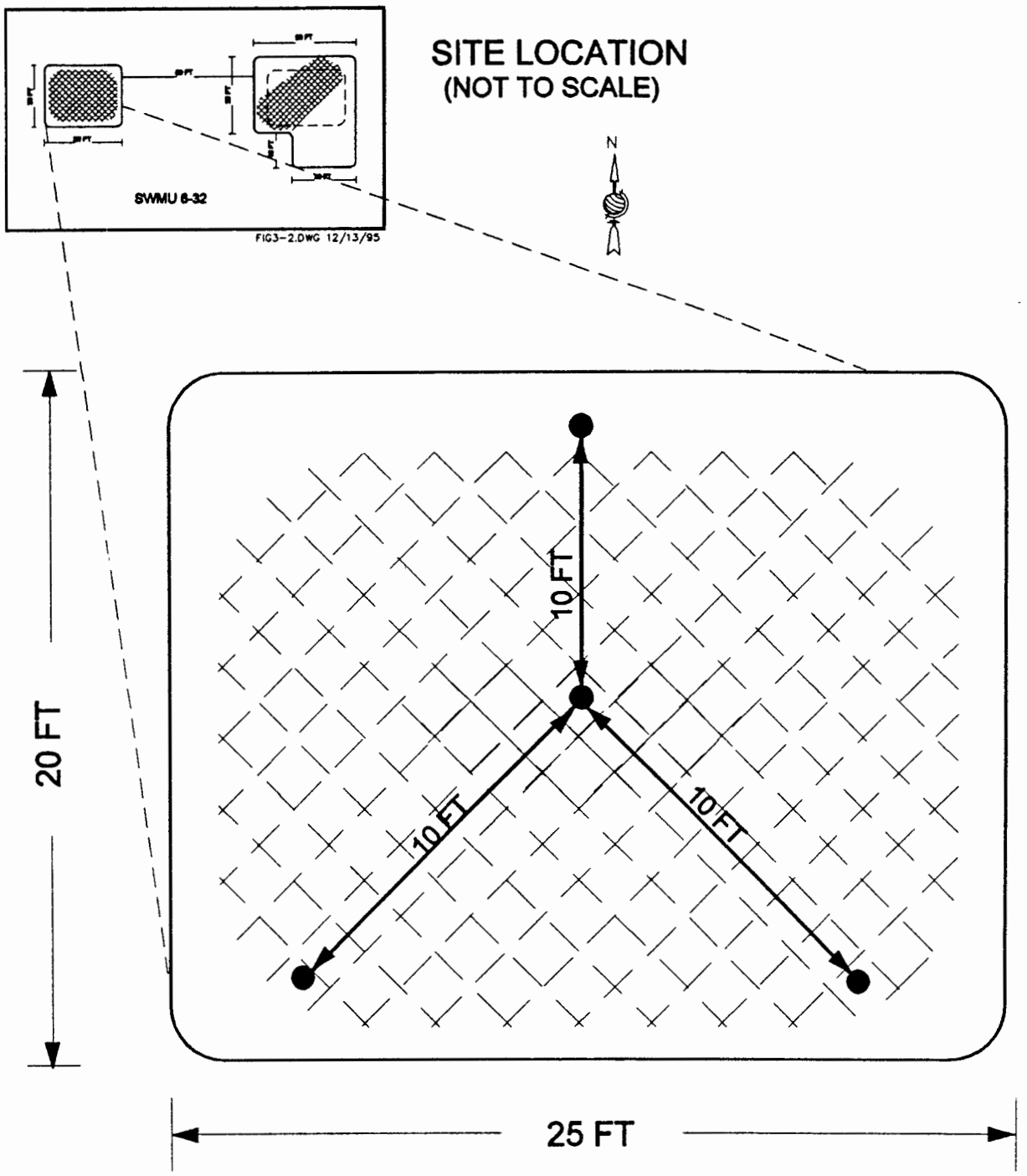


Figure 3. Confirmatory Lead Sampling Locations At SWMU 6-32, Manzano Fire Training Area (FT-14)