



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733
March 12, 1996

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Mr. Benito Garcia, Chief
Hazardous and Radioactive Bureau
New Mexico Environment Department
P.O. Box 26110
Santa Fe, New Mexico 87502

RE: RCRA Facility Investigation (RFI) Appendix III Report,
Wastelines and Non-Wastelines, Kirtland Air Force Base,
NMD9570024423

SS

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has completed a technical review of Kirtland's RFI Appendix III Report received December 8, 1995, and has determined that the Report is deficient. Enclosed is a list of deficiencies and comments.

EPA recommends that NMED require Kirtland to submit a revised Report which addresses the enclosed comments. If you have any further questions, please contact Mr. Rich Mayer at (214) 665-7442 or Ms. Nancy Morlock at (214) 665-6650.

Sincerely yours,

David Neleigh
David Neleigh, Section Chief
New Mexico - Federal Facilities

Enclosure



KAFB1743



**Notice of Deficiency Comments for
the Appendix III Wastelines Report**

General Comment: Kirtland needs to include in the revised report a signed certification in accordance with 40 CFR 270.11.

General Comment: Kirtland needs to include in the revised report a monitoring plan for SWMUs that will continue to receive solid waste containing hazardous constituents, especially those SWMUs that are located underground or on the ground.

General Comment: The borehole log descriptions located in Appendix C are not legible or in numerical order. Also, EPA could not locate the following borehole descriptions: 201-01 & 02; 203-01 thru 06; 210-01 thru 05; 211C-01 thru 04; WP-38; WP-47; ST-213; and ST-224. Please provide legible descriptions in an orderly fashion in the revised RFI report.

Oil/Water Separators, Sediment Traps, and Holding Tank Inflow and Outflow Lines

Page 5-96; Recommendations: Please provide a time schedule for performing the additional investigations on this SWMU in the revised report.

Page 5-102; Recommendations: Please include a time schedule for the second phase of the Stage 2B RFI in the revised report.

Page 5-110; Recommendations: Please provide a time schedule for performing the additional investigations on this SWMU in the revised report.

Page 5-211; Recommendations: Please provide a time schedule for performing the additional investigations on this SWMU in the revised report.

Storm Sewer Systems

Page 7-12; Recommendations: Please provide a time schedule for performing the additional investigations on this SWMU in the revised report.

Page 7-18; Recommendations: Please provide a time schedule for performing the additional investigations on this SWMU in the revised report.

Page 7-25; Recommendations: Please provide a time schedule for performing the additional investigations on this SWMU in the revised report.

Page 7-31; Recommendations: Please provide a time schedule for performing the additional investigations on this SWMU in the revised report.

Septic Tanks, Leach Fields, and Lines

General Comment: The RFI workplan requires borings to go approximately 12 foot below the base of the drain line, Kirtland only went 8 feet from the surface. Please explain why Kirtland did not follow the approved workplan?

Page 8-31; RFI Field Investigation: The boreholes taken under Building 620 were several feet away from the building/drain field. Why were slant borings not used?

Also, the RFI workplan requires borings to go approximately 12 foot below the base of the drain line, Kirtland only went 9 feet from the surface. Please explain why Kirtland did not follow the approved workplan?

Page 8-76; Recommendations: Please provide a time schedule for performing the additional investigations on this SWMU in the revised report.

Page 8-175; Recommendations: Please provide a time schedule for performing the additional investigations on this SWMU in the revised report.

Page 10-3; RFI Investigation: Please include in the revised report the maps and the analytical results from soil sampling performed during the Stage 2B RFI. Please clarify why the work for this SWMU was included in the wastelines workplan, but the results are included in the Stage 2B RFI report.

Page 10-19; Recommendations: Please provide a time schedule for performing the additional investigations on this SWMU in the revised report.

Page 10-19; RFI Investigation: Please include in the revised report the maps and the analytical results from soil sampling performed during the Stage 2B RFI. Please clarify why the work for this SWMU was included in the wastelines workplan, but the results are included in the Stage 2B RFI report.

NOD Comments for the Appendix III Non-Wastelines Report

General Comment: Kirtland needs to include in the revised report a signed certification in accordance with 40 CFR 270.11.

General Comment: Kirtland needs to include in the revised report a monitoring plan for SWMUs that will continue to receive solid waste containing hazardous constituents, especially those SWMUs that are located underground or on the ground.

Page 6-11; Conclusions and Recommendations: EPA recommends that Kirtland complete another soil boring near boring number FT-52C-03, since the deepest sample, the 25-27 foot sample, contained nickel at 551 ppm, ten times the background levels. Soil borings

FT-52C-08 & 09 also contained elevated levels of nickel in the 24-26 foot interval above background levels and should be resampled. Please revise the report.

Page 9-11; Recommendations: Please provide a time schedule for performing the additional investigations on this SWMU in the revised report. Also, each borehole log description for SWMU 276 only includes the first 10 feet, please include the remaining logs.

Page 10-10; Recommendations: Please provide a time schedule for performing the additional investigations on this SWMU in the revised report. Also, each borehole log description for SWMU 277 only includes the first 10 feet, please include the remaining logs.

Page 13-3; Table 13-1: Borehole number 02 indicates a PID reading of 10 ppm at 15-17 feet and a 140 ppm reading at 24-26 feet. However, no contamination was found in the analytical results. Please explain in the revised report.

SWMU ST-64; Borehole Log: Did Kirtland complete a lithologic description for the first five feet? Please include this information in the revised report.

Page 14-10; Recommendations: Please provide a time schedule for performing the additional investigations on this SWMU in the revised report.

Page 15-10; Recommendations: Please provide a time schedule for performing the additional investigations on this SWMU in the revised report.

Page 16-6; Recommendations: Please provide a time schedule for performing the additional investigations on this SWMU in the revised report.

Page 18-10; Recommendations: Please provide a time schedule for performing the additional investigations on this SWMU in the revised report.