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State of New Mexico  
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MARK E. WEIDLER  
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DEPUTY SECRETARY

July 8, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Colonel Elizabeth A. Harrell, Commander  
377th Air Base Wing  
2000 Wyoming Blvd SE  
Kirtland Air Force Base (KAFB), NM 87117-5659

Dear Col. Harrell:

The New Mexico Environment Department (NMED) has reviewed two KAFB's Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Appendix III Reports, one for the Wastelines and another for the Non-Wastelines Sites, both dated October 23, 1995, and has determined that both reports are deficient. Attached is a list of deficiencies and comments.

KAFB is required to revise the RFI report by addressing the attached deficiencies, and re-submit it to this agency within forty five (45) days of KAFB's receipt of this correspondence, as authorized in KAFB's Hazardous and Solid Waste Amendments (HSWA) module of its RCRA permit, Section Q.

If you have any question, please contact Mr. Stephen Pullen or Mr. Cornelius Amendyas at (505) 827-1558 for RCRA technical or permitting issues respectively, or myself.

Sincerely,

Benito Garcia, Chief  
Hazardous and Radioactive Materials Bureau (HRMB)

Attachment

- XC: (w/attac)  
Barbara Hoditschek, HRMB  
Cornelius Amendyas, HRMB  
Steve Pullen, HRMB  
Julie Jacobs, GWQB  
David Neleigh, EPA  
Chris DeWitt, KAFB

KAFB1781



**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, the following borehole locations could not be located: 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 feet 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 feet 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:** It is recommended 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.