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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

July 9, 1996

Christopher B. DeWitt, R.P.G.
Chief
Environmental Management Division
377 ABW/EMR
2000 Wyoming Blvd SE
Kirtland Air Force Base
Albuquerque, New Mexico, 87117

**RE: Technical Determination of Clean Closure Certification
Eligibility for the Sewage Lagoons and Golf Course Main Pond
Kirtland Air Force Base**

Dear Mr. DeWitt:

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) has reviewed KAFB's April 18, 1996 document titled "Kirtland Air Force Base Sewage Lagoons and Golf Course Main Pond Post-Closure Monitoring" report. NMED has evaluated this report in terms of Kirtland Air Force Base's (KAFB's) April 18, 1996 letter requesting that the Sewage Lagoon (SL) and Golf Course Main Pond (GCMP) be considered eligible for clean closure certification. Chromium (Cr) is the constituent of concern at the SL and GCMP.

In reviewing the groundwater monitoring data for Cr at the SL and GCMP, the data were compared with the New Mexico Water Quality Commission (WQCC) standard (0.05 mg/L, dissolved fraction), the EPA Region III Risk-Based Concentration (guidance) for Cr VI (0.180 mg/L), and the Federal Maximum Contaminant Level (MCL) under the Safe Drinking Water Act (0.100 mg/L). During the four (4) quarterly sampling events in which dissolved Cr was evaluated (5/95 - 3/96), there were no exceedances of the WQCC standard. Additionally, concentrations of hexavalent Cr, the more toxic form of Cr, never exceeded any standard or guidance levels. Exceedances of the Federal MCL, however, occurred during the 2/95 sampling event at SL monitoring wells 0502 (0.12 mg/L), 0503 (0.10 mg/L), and 0504 (0.16 mg/L); and at GCMP monitoring well 0608 (0.12 mg/L). These data prompted NMED to require two (2) additional groundwater sampling events at the SL and GCMP.

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DeWitt, KAFB
Page 2
July 9, 1996

The data from the two (2) additional quarterly sampling events (12/95 and 3/96) required by NMED (December 12, 1995 letter to KAFB) indicate that the groundwater has not been impacted by KAFB's activities at the SL and GCMP.

HRMB concludes, therefore, that KAFB has fulfilled requirements of the post-closure sampling plan, and that the SL and GCMP are technically eligible for clean closure certification by KAFB under RCRA.

As part of the RCRA certification report to be prepared by KAFB for NMED verification and approval, KAFB should address eventual disposition of the SL and GCMP. Specifically, the SL have residual sludges. KAFB should address whether they will eventually remove these sludges or provide a clean fill over them for enhanced protection of health and environment.

Regardless of any RCRA-related decisions, pursuant to New Mexico WQCC abatement regulations (Section 4103.D), which require eight (8) consecutive quarterly samples meeting WQCC standards for completion of the abatement process, KAFB should be informed that the Ground Water Quality Bureau (GWQB) may have additional concerns at the SL and GCMP. Furthermore, it is HRMB's understanding that GWQB may have concerns for non-RCRA constituents (e.g. nitrate) at the SL and/or GCMP.

KAFB must therefore submit to NMED **within 60 days of your receipt of this letter**, by registered mail, a certification report that the Sewage Lagoon and Golf Course Main Pond have been closed in accordance with the specifications of the closure plan approved by NMED in a letter to KAFB, dated July 6, 1994. The certification must be signed by a New Mexico registered independent professional engineer in compliance with New Mexico Hazardous Waste Management Regulations contained in 20 NMAC 4.1, Subpart V, 40 CFR §264.115.

If you have any questions regarding this matter, please call Cornelius Amindyas at (505) 827-1561.

Sincerely,



Barbara Hoditschek, Manager
RCRA Permits Program
Hazardous and Radioactive Materials Bureau

cc: Benito Garcia, Chief, HRMB
David Neleigh, Chief, EPA Region VI 6PD-N)
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