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

MAR 0 3 1997

Mr. Benito Garcia, Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044A Galisteo Street
Santa Fe, NM 87505

Dear Mr. Garcia:

The Environmental Protection Agency has reviewed the December 16, 1996, Addendum to the Sampling and Analysis Plan for the Appendix III Phase 2 RCRA Facility Investigation submitted by Kirtland Air Force Base and offers the enclosed comments.

If you have any questions, please contact Ms. Nancy Morlock of my staff at (214) 665-6650.

Sincerely yours,

David W. Neleigh, Chief
New Mexico - Federal Facilities

Enclosure

cc: Mr. Steve Pullen
New Mexico Environment Department

KAFB1836

EPA COMMENTS
KIRTLAND AIR FORCE BASE
ADDENDUM TO THE APPENDIX III PHASE 2 SAMPLING AND ANALYSIS PLAN
FINAL DRAFT - DECEMBER 1996

GENERAL COMMENTS

1. The Sampling and Analysis Plan presents only site-specific information and makes reference of the Kirtland Air Force Base Appendix III RFI as the source of the project scoping documents that will be used to implement this Sampling and Analysis Plan. The EPA has previously reviewed and approved the Appendix III RFI Work Plan and agrees with the proposed approach. However, some site-specific information appears to be missing from the Sampling and Analysis Plan. Specifically, Kirtland should submit further information concerning:

   A. Identification of Potential Receptors
   B. Site Background Information
      - Topography and surface drainage map for the vicinity of the SWMU
      - Direction and rate of groundwater flow, depth to groundwater
   C. Precision objectives for all field instruments

   Kirtland should submit this information to NMED for review.

2. Throughout the Sampling and Analysis Plan, Kirtland presents an approach whereby the constituents of concern (COCs) for each area are determined through a single sampling point which receives expedited laboratory analysis. Subsequent subsurface samples are then analyzed only for those COCs which are detected in the initial sampling point. The EPA disagrees with this approach and recommends instead that all samples are analyzed for the full suite of analytical parameters (VOCs, SVOCs, metals, and TPH).

3. Kirtland should identify the fence lines in each legend. These lines could be misinterpreted as utility lines.

SPECIFIC COMMENTS

4. **Executive Summary, Section ES1, Methods of Investigation, Page ES-1**

   a. Kirtland states that the vertical extent of contamination will be defined through field screening, visual examination, and/or olfactory inspection. However, the vertical extent of contamination should be defined through soil sampling and laboratory analysis. Investigatory techniques such as field screening, visual examination, and olfactory inspection may supplement the investigation. Kirtland should revise this section to state that the vertical extent of contamination will be determined through soil sampling and laboratory analysis.

and outflow lines to the septic tank. Samples should be collected at some regular interval (for example, every 20 or 25 feet) along the line, at a depth equal to or slightly below (approximately 1-2 feet) the burial depth of the line.

SWMU 10-21, BUILDING 66042, SEPTIC TANK, LEACH FIELD, AND LINES (ST-344)

15. **Section 6.1, Site Background and Environmental Setting, Page 6-1**

Kirtland should provide more information concerning the nature of the "small experiments facility" located at Building 66042.

16. **Section 6.4, Work Plan and Rationale, Page 6-1**

Kirtland proposes to collect samples from three boreholes located near the leach field lines. However, EPA recommends that additional samples be collected along the inflow and outflow lines to the septic tank. Samples should be collected at some regular interval (for example, every 20 or 25 feet) along the line, at a depth equal to or slightly below (approximately 1-2 feet) the burial depth of the line.

SWMU 10-21, BUILDING 66006, SEPTIC TANK, LEACH FIELD, AND LINES (ST-345)

No comments