



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

STU
U BRL

APR 02 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 (EPA) has reviewed the final draft Appendix III Phase 2 Sampling and Analysis Plan RCRA Facility Investigation (RFI) Report submitted by Kirtland Air Force Base (Kirtland) in May 1996. The EPA comments concerning the Appendix III Phase 2 Sampling and Analysis Plan are enclosed for your review and consideration.

If you have any questions, please contact Ms. Ruby Williams of my staff at (214) 665-6733.

Sincerely yours,

David W. Neleigh
David W. Neleigh, Chief
New Mexico-Federal Facilities

Enclosure

cc: Mr. Steve Pullen
New Mexico Environment Department

KAFB1844



EPA Comments
Appendix III Phase 2 Final Draft
SAMPLING AND ANALYSIS PLAN
Kirtland Air Force Base

GENERAL COMMENTS

1. In the October 23, 1995, RCRA Facility Investigation Reports for both the Wasteline and Non-Wastelines Sites at Kirtland Air Force Base, Figures (1-1) and (1-2) were provided depicting the location of Kirtland AFB and a general site plan. These Figures should be added to this Sampling and Analysis Plan to complement the Appendix III Phase 2 Site Locations depicted on Page 1-2 of this report.
2. For each of the 14 Wastelines Site SWMUs and 5 Non-Wasteline Site SWMUs, discussed in the RFI Appendix III Phase 2 Sampling and Analysis Plan (SAP), the reviewer is referred "generally" to Appendix F of the Appendix III RFI Report (USAF, 1995a) for full analytical results. However, Appendix F is voluminous consisting of 13 total volumes of data. The reference to Appendix F should reference the specific volume in which the data for that specific SWMU is located. At a minimum a Summary Table should be provided in the SAP cross-referencing each SWMU to the appropriate Appendix F volume.
3. Summary Tables of SWMU analytical results are provided throughout this SAP. The reviewer is referred to Appendix F of the Appendix III RFI Report (USAF, 1995a) for full analytical results. However, Appendix F is also a summary of "raw" data:
 - a) It should be specified where the "raw" data can be found to facilitate the confirmation of the accuracy of the Appendix F summary table.
 - b) spot checks of Appendix F data reveals several instances where Non-detect (ND) analytical results were reported in cases in which the Lab Detection Limit exceeds the HHRB action level. Please provide explanation for why Lab Detection Limits appropriate to assess compliance with HHRB were not used.
4. As referenced in the Introduction (Page 1-1) "investigations will be conducted in accordance with the plans approved by the U.S. Environmental Protection Agency (EPA) on April 7, 1994, for the Appendix III SWMUs (USAF, 1994, a,b)." That RFI workplan requires borings to go to approximately 12 feet

GENERAL COMMENTS (cont'd)

below the base of the drain line. However, throughout this supplemental SAP workplan, proposed boring depths are less than 12 ft (5 ft to 7 ft). This is the case for ST-285, ST-286, ST-325, ST-331, ST-229, ST-276 and ST-277. Please explain the rationale for deviating from the original RFI Workplan.

5. The borehole log descriptions located in Appendix C are not legible and are not in numerical order. Please provide legible descriptions in an orderly fashion in the revised RFI report.

Specific Comments:

1. Section 1.1, Page 1-1 and Table 1-1 on page e 1-3: SWMUs 8-13 Site St-221, SWMU 10-7 Site 202, SWMU 10-7 Site ST 219, SWMU 10-7 Site 260, and SWMU 10-7 Site ST-265 are scheduled for further investigation during the Appendix II Phase 2 RFI (USAF, 1995c) that will be expanded to include Appendix III sites associated with Appendix II sites. Please provide a time schedule for the further investigation of these SWMUs.
2. Section 2.2, Page 2-1, 1st Paragraph: Please provide a time schedule for addressing the nickel concentration detected in borehole ST-250C-01 (13 to 17 ft) during the Appendix II Phase 2 RFI.
3. Section 2.4, Work Plan and Rationale, SWMU 8-28, Building 20338, OWS Lines, Page 2-5: Kirtland proposes to analyze the deepest soil sample from each borehole for TPH by EPA SW-8015B. The use of TPH as a screening tool is acceptable, but the purposes of a RCRA Facility Investigation, testing should be conducted for hazardous constituents through VOC, SVOC, metals, PCB, etc., analysis. This comment also applies to other sites within the Sampling and Analysis Plan where TPH analyses are proposed in lieu of VOC analyses (i.e., SWMU 10-21).
4. SWMU 10-21; Page 10-5: Since the diesel fraction component of TPH was detected in borehole ST311C-02, Kirtland should also sample for semivolatiles.
5. Section 12.2, Page 12-1: Full analytical results for SWMU 9-20 Site ST-277 was not found in Appendix F of the Appendix II RFI Report (USAF, 1995b) as referenced. Please provide the full analytical results for this SWMU.

Specific Comments (cont'd):

6. **SWMU 9-20; Page 12-7:** Since semivolatiles were detected in the previous sampling event, they should be included in the Phase II investigation.
7. **Section 13.2, Page 13-1:** Appendix F did not contain VOC analytical results for SWMU Site ST-337. Please provide the VOC analytical data for this SWMU.
8. **Section 13.4, Page 13-6:** The narrative description of the investigative technique on Page 13.6 is inconsistent with the proposed scope of investigation summarized in Table 13-2. Please clarify which proposed investigative plan is correct.
9. **Section 15.2, Page 15-1:** Full analytical results for SWMU WP-339 was not found in Appendix F of the Appendix II RFI Report (USAF, 1995b) as referenced. Please provide the full analytical results for this SWMU.