



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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September 10, 1997

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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 completed its review of the Kirtland Air Force Base May 1997 Final Draft Interim Corrective Measure Work Plan for SWMU ST-66, the Trestle Facility. EPA comments are attached for your review and consideration. *APPW I*

In general, EPA found that the proposed Interim Corrective Measure (ICM) is acceptable and recommends approval of the ICM Work Plan following the receipt of some additional information from Kirtland AFB.

Sincerely yours,

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

cc: Mr. Jerry Bober, NMED
Mr. Steve Pullen, NMED

KAFB1884



EPA COMMENTS
KIRTLAND AIR FORCE BASE
INTERIM CORRECTIVE MEASURE WORK PLAN FOR SWMU ST-66, TRESTLE
FACILITY
FINAL DRAFT - MAY 1997

GENERAL COMMENTS

1. Kirtland should explain the basis for selecting this medium-priority site for an interim corrective measure. EPA strongly supports the use of interim corrective measures, especially at high-priority sites. Why was this site selected, and could the funding of this ICM potentially jeopardize the funding of permit-required activities at high-priority sites?
2. What is the anticipated project schedule? Does Kirtland plan to complete this project during FY97?
3. Confirmatory samples should be collected from the base of the excavation of the oil/water separator in order to verify that no contamination remains after implementation of this interim measure.

SPECIFIC COMMENTS

1. Section 2.2, Kirtland Air Force Base History, Page 2-1 Kirtland should specify the period of operation for the Trestle Facility. The text states that the first test was conducted in 1980, but no date is given for when testing was stopped (Section 2.3 does specify that there are no plans to continue testing at this facility).
2. Section 2.3.1, Trestle Facility Test Stand, Page 2-7 Kirtland states that "As an additional fire safety precaution, aircraft fuel systems were made inert prior to testing by filling the fuel tanks with fuel and draining them while replacing the air with nitrogen gas." Were the fuel tanks drained in a controlled manner so as to prevent any accidental releases to the ground? Where did this operation take place?
3. Figure 2-2, Trestle Facility Location Map, Page 2-5 The location of the aircraft pit should be depicted on this figure.
4. Section 2.5, Previous Analytical Results and Recommendations, Page 2-11

Kirtland states that the New Mexico Environment Department action level of 100 ppm was not exceeded at the vehicle pit. However, this action level is for underground storage tank sites and does not therefore apply to this site.

5. Section 3.2, Scope of Work
More detail concerning the proposed Interim Corrective Measure should be provided in this section.
 - a. Kirtland states that samples will be analyzed for VOCs, SVOCs, TPH, metals, and PCBs, but neither EPA test methods nor QA/QC procedures, including field and trip blank procedures, have been specified. Section 3.4, Data Quality and Submittal Requirements, does not specify this information either.
 - b. A more detailed sampling map should be provided and referenced in this section. Figure 2-2 depicts the four proposed sampling locations, but the scale is such that much of the detail of the test stand area cannot be readily examined. How were the four proposed sampling locations selected? A cross-sectional map of the area, showing the height of the test stand, etc., may be helpful.
 - c. Kirtland should explain the purpose and location of the "trestle bowl" is. It is referenced for the first time in this section.
 - d. Will any field screening methods be employed to aide in the selection of sampling locations and/or intervals, or to direct additional sampling should contamination be revealed in the deepest interval sampled?