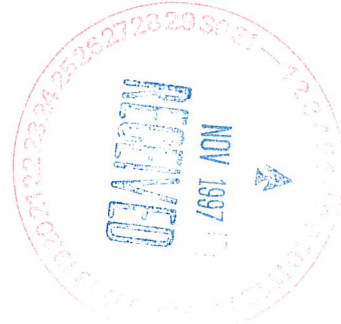




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

*Sta -  
Class forward  
these comments to  
KAFB by 12/12/97  
Bando*  
ENTERED

November 4, 1997



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

C-30  
RW-68 IV

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has completed its review of the Kirtland Air Force Base (KAFB) April 1997 Final Draft Interim Corrective Measures Report for Seven Solid Waste Management Units and One Nuclear Regulatory Commission Site. EPA comments are attached for your review and consideration.

Based upon the information presented in the report, the EPA agrees with KAFB's assessment that further characterization is required on Solid Waste Management Unit (SWMU) numbers 6-30, RW-68 and RW-10. EPA also agrees with KAFB's recommendation of no further action on SWMU numbers ST-60, 8-6, and AOC 6-A1. EPA recommends KAFB initiate a Class 3 permit modification request for these SWMUs. However, additional information is required on SWMU's number ST-338 and 6-24 before a recommendation of no further action can be provided.

If you have any questions or need additional information, please contact Ms. Debra Tellez of my staff at (214) 665-8140.

Sincerely,

*David W. Neleigh*  
David W. Neleigh, Chief  
New Mexico and Federal  
Facilities Section

Enclosure



EPA Comments  
Kirtland Air Force Base  
Interim Corrective Measures Report for  
Seven Solid Waste Management Units and  
One Nuclear Regulatory Commission Site  
Final Draft - April 1997

GENERAL COMMENTS

1. Site location maps should also include elevation contours, so that surface runoff pathways and outfall areas down gradient of these areas may be easily identified. Source Best Professional Judgement (BPJ).

SPECIFIC COMMENTS

1. Page 4-1, Para. 4.1, SWMU ST-338, Site History: Recommend the results of the two background samples (ST338-01B and ST338-01A) from the 1994 Sampling Event be provided. Source BPJ.
2. Page 4-3, Figure 4-2, SWMU ST-338, Soil Sample Locations: Legend specifies 1995 sampling locations while the text on page 4-4 references a 1996 sampling event. Recommend the two areas be consistent. Source BPJ.
3. Page 8-1, Para. 8, DNWS Radiation Training Sites 5, 6, and 7: Recommend the text specify that these training sites are "inactive." Source BPJ.
4. Page 8-1, Para. 8.1, DNWS Radiation Training Sites 5, 6, and 7 Site History: Recommend the actual size of the training sites be specified along with the size of the contaminated area within each site to provide a true picture of the magnitude of the area contaminated relative to the actual size of the training site. Source BPJ.

<u>Site</u>	<u>Actual Size</u>	<u>Actual Contaminated Area</u>
TS-5	13.4 acres	1.33 acres
TS-6	19 acres	1.63 acres
TS-7	8 acres	0.63 acres

5. Page 8-1, Para. 8.2, 8, DNWS Radiation Training Sites 5, 6, and 7 Proposed Corrective Measures: Recommend the reference to Air Force Instruction 31-201 be changed to 31-209 to correspond with the regulation cited earlier on page 5-1 and with the regulation cited in the next paragraph (8.3). Source BPJ.
6. Page 9-10, Para. 9.3, SWMU 6-24, Implemented Corrective

Measures: This paragraph indicates that because the copper, lead, and zinc concentrations of the aqueous samples exceeded the discharge standards, permission was denied to dispose of the Imhoff tank water in the sanitary sewer. It, however, does not address how this water was disposed of. Recommend a detailed explanation be provided on the disposal of this water. Source BPJ.

7. Page 9-11, Para. 9.3, SWMU 6-24, Implemented Corrective Measures: This indicates that NMED Ground Water Bureau, with the EPA's approval, granted a one-time variance for the treatment and disposal of the hydrocarbon-contaminated sludge at a landfarm. Recommend documented evidence of this variance be provided along with any stipulations/special requirements/etc. Please provide a current status of the landfarm treatment of this sludge (waste removal activities were conducted at this site between July and August 1996). Source BPJ.