



DEPARTMENT OF THE AIR FORCE  
 HEADQUARTERS 542D CREW TRAINING WING (MAC)  
 KIRTLAND AIR FORCE BASE, NEW MEXICO 87117 - 5000

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5 MAY 1992



Dr Bruce Swanton  
 Hazardous and Radioactive Materials Bureau  
 NM Environment Department  
 PO Box 26110  
 525 Camino de los Marquez  
 Santa Fe NM 87502

Dear Dr Swanton

Funding for the closure of the base sewage lagoon system has been secured and a statement of work (SOW) for closure prepared. Funds approval occurred in a highly competitive environment including National Priority List sites at several other installations. However, due to the delay in funding, we will be unable to complete closure by late May of this year. In addition, the regulations require that we demonstrate that groundwater below the sites is not contaminated before we can certify clean closure. This sampling is scheduled for the third week of May and final QA/QC'd analytical results will not be available for approximately 3 months following sampling. We are therefore requesting a 180 day extension so that we can complete work at the sites and certify clean closure.

As a result of a further review of the risk assessment performed during the preparation of the closure plan for the sewage lagoons, and a telephone conversation between John Gould and yourself, we feel that the lagoon sludge does not constitute a hazardous waste. However, our available analytical data indicate that the material may exceed land disposal limitations for constituent concentrations in waste (40 CFR 268.43). As stated in the closure plan, we will resample the sludge and have it analyzed using the TCLP method. As we discussed, if the new analytical results show the sludge to be below the land disposal limits, the material will not need to be removed. If the land disposal limits are exceeded, the sludge will be treated to comply with the land disposal regulations prior to disposal.

Please respond as soon as possible regarding our request for an extension to the closure deadline. If you have any questions, please contact John Gould at 846-2773.

Sincerely

*Thomas A. Norris*  
 THOMAS A. NORRIS, Colonel, USAF  
 Director  
 Environmental Management Division



cc: GCL (Mike Silva)