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PETER MAGGIORE
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MEMORANDUM

TO: Jerry Sillerud, Environmental Management Division, KAFB
 FROM: WPM William P. Moats, HRMB/NMED
 DATE: January 5, 2000
 RE: **COMMENTS ON DRAFT ICM WORK PLAN FOR AREAS OF CONCERN
 SS-78, WATER TOWER SOILS; SS-79, BUILDING 381 SPILL SITE; AND
 WP-87, GRABS SITE WASTE PILE, DECEMBER 1999**

I have reviewed the subject (draft) document and offer the following comments:

1. Page ES-2, 1st paragraph, the text states "The petroleum-contaminated soil was assumed to be from a spill or possibly a french drain".

If possible, the original source of the waste pile should be determined. This information will be needed when the time comes for KAFB to propose the site for No Further Action (NFA).

2. Page 2-4, Section 2.1.1, first sentence

According to this sentence, the SWMU assessment field investigation was conducted in May 1997. However, Table 2-1 (Page 2-5) indicates that the SWMU assessment was conducted in 1996. Either the sentence or table should be revised to reflect the correct date.

3. Page 2-4, Section 2.1.1, 2nd sentence, the text states "*Subsurface* (emphasis added) samples were collected from 0-0.5 ft below ground surface...".

By agreement (KAFB background study), samples collected at a depth of 0-0.5 ft are surface-soil samples.

4. Page 2-6, first bullet

Analytical results for Al, Cu, Zn, and Be are not included in the draft work plan. No conclusions can be drawn regarding these specific constituents. This information will be needed when the time comes for KAFB to propose the site for No Further Action (NFA).

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5. Page 2-6, second bullet

As discussed with you on January 4, 2000, I noted that Hg should be considered a constituent of concern. Although not addressed in the work plan, it was revealed in our discussions that Hg was sampled at each of the water-tower locations. At each location, Hg in soil was found by KAFB to be at background levels. This information will be needed when the time comes for KAFB to propose the site for No Further Action (NFA).

6. Page 2-6, last paragraph of Section 2.1.1

Although it is true that As occurs on KAFB at natural concentrations that often exceed EPA screening levels, analytical results demonstrate that As levels at Water Tower 21650 are representative of contaminated conditions (likely that the paint is the source of both As and Pb at this site).

Although not addressed in the work plan, As was sampled at each of the water-tower locations. At every tower location other than 21650, As was found by KAFB to be at background levels. This information will be needed when the time comes for KAFB to propose the site for No Further Action (NFA).

7. Page 2-10, Figure 2-3

The proposed excavation depth/limits appear to be appropriate for the purpose of removing the bulk of the contaminated soil. The work plan contains a contingency to remove additional soil, if necessary.

8. Pages 2-12 and 2-13, Figures 2-5 and 2-6

The proposed excavation depths/limits appear to be appropriate for the purpose of removing the bulk of the contaminated soil. The work plan contains a contingency to remove additional soil, if necessary.

9. Page 2-14, Section 2.2, bullet 5

Confirmation samples should also be analyzed for total As at Tower Site 21650.

10. Page 2-15, first bullet at top of page

See comment 9.

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11. Page 2-15, third bullet from top of page

Samples should also be analyzed for TCLP As at Tower Site 21650.

12. Page 3-3, last two bullets regarding metals

Analytical results for metals are mostly not included in the draft work plan. No conclusions can be drawn as to whether any metals should be considered as contaminants. The elevated hits for Cr and Pb can not be evaluated to determine whether these higher values represent actual site contamination. This information will be needed when the time comes for KAFB to propose the site for No Further Action (NFA).

13. Page 3-4, last two bullets

See comment 12.

14. Page 4-1, 1st paragraph, next to last sentence states "The source of the contaminated soil was assumed to be from a spill or possibly a french drain...".

See comment 1.

15. Page 4-3, Section 4.1.1, first paragraph, second sentence states "One soil sample was collected from the waste pile, and the other at a depth of 5 ft below the waste pile".

Please clarify whether the sample was collected 5 ft below original grade of the ground surface or at a depth of 5 ft within the waste pile. The TPH results for this sample is 503 mg/kg. The proposed 2 ft excavation depth may not be deep enough based on this sample.

16. Page 4-3, last two bullets

Analytical results for metals are mostly not included in the draft work plan. No conclusions can be drawn as to whether any metals should be considered as contaminants. This information will be needed when the time comes for KAFB to propose the site for No Further Action (NFA).

17. Page 4-4, last bullet and last paragraph

See comment 16.

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18. Page 4-4, first paragraph, last sentence states "All samples were analyzed for VOC's, SVOC's, TPH-DRO, and TAL metals".

Analytical results for VOC's are not addressed in the work plan.

19. Page 4-6, first paragraph

What is the source of the water in the explosive testing sump? What does the sump look like? Does the sump have a mechanism to drain? Is there any sludge at the bottom of the sump? This information will be needed when the time comes for KAFB to propose the site for No Further Action (NFA).

20. Page 4-7, last bullet

- A. Can process knowledge eliminate the need to analyze for pesticides and herbicides?
- B. What does explosives (*low level*) mean?
- C. If the purpose of the radiochemical analyses is to screen for the possible presence of radioactive contamination, then KAFB should analyze the water sample for gross alpha, gross beta, and gamma spectrum.
- D. What is the purpose of analyzing the waste water in the sump for anions?

cc: Stephanie Kruse, HRMB/NMED
Roland Rocha, HRMB/NMED