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GOVERNOR

SEP 7 1995

State of New Mexico
ENVIRONMENT DEPARTMENT
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*For R I
Barlow
FY I
Feb 5*

MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

MEMORANDUM

TO: Benito Garcia, Chief, HRMB, NMED
FROM: Lloyd Aker, SNL/ITRI POC, DOE Oversight, NMED
DATE: August 25, 1995
RE: SNL's *Sampling and Analysis Plan for Environmental Restoration Site 22, Storage Burn, Operable Unit 1334*

The following represent AIP technical comments regarding the above referenced document. These comments are provided for the purpose of communicating the results of our technical review. They are not provided for the purpose of representing the regulatory position of the New Mexico Environment Department.

Environmental Restoration (ER) Site 22 was enclosed by a five-strand barbed wire fence approximately 50-ft by 50-ft (now removed). The area inside the fence contained 1 empty 55-gallon drum, scraps of fiberboard and charcoal, and several wooden pallets (these waste materials have now been removed). History of the site is unknown.

The sampling described in this plan has already been conducted by SNL.

Comments

1. Page 3-1, Section 3.3. SNL states "The limited precipitation, the low permeability of the surface soils, and the low infiltration rates (SNL/NM February 1994), preclude ground water as a primary pathway".

ER Site 22 is located along the Manzanita Mountains front, in a recharge area generally characterized by relatively shallow ground water. Coarse colluvial materials were noted during a field survey of the site. It is likely that these materials exhibit high hydraulic conductivities and infiltration rates.

However, because there is no visible evidence at ER Site 22 that large quantities of liquids were managed, AIP staff believe that there is little risk to ground water there.

2. Sitewide background concentrations are not presently known for the KAFB area. Because only 6 site-specific background samples are to be collected (according to the plan), analytical results

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for inorganic constituents should be compared to sitewide background before the site is deemed tentatively appropriate for No Further Action (NFA).

3. The use of action levels to decide whether further environmental assessment should be conducted at this site is inappropriate. Any detections of organic constituents should trigger additional sampling to confirm and delineate the extent of contamination. Inorganic constituents should be compared to sitewide background (see item #2). If inorganics exceed background, then additional sampling should be conducted.

4. One of the background samples (the northeast one) may have been taken in a predominantly downwind direction. The wind was from the southwest during the site survey (June 29, 1995, at ~11:00 a.m.).

5. Given that site history is unknown, the concerned public may be more willing to accept this site for NFA if a few samples were collected and analyzed for volatile organics.

Reviewed by: Chris Hanlon-Meyer

LA/WPM/wpm

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