

NEW MEXICO
HEALTH AND ENVIRONMENT
DEPARTMENT

1190 St. Francis Drive
Santa Fe, New Mexico 87503

GARREY CARRUTHERS
Governor

CARLA L. MUTH
Secretary

MICHAEL J. BURKHART
Deputy Secretary

March 9, 1989

Colonel Thomas W. Sullivan, Commander
1606 Air Base Wing
Kirtland Air Force Base, NM 87117

Dear Colonel Sullivan:

I have recently reviewed the RCRA Facilities Assessment (RFA) report performed by A. T. Kearney for EPA, dated August 5, 1988. While I am not directly involved in oversight of the Installation Restoration Program (IRP) activities planned at Kirtland, as the state permit writer for Kirtland I feel obligated to inform you that the work scheduled under the IRP may be insufficient to meet the requirements for corrective action mandated by the Resource Conservation and Recovery Act (RCRA).

The Hazardous and Solid Waste Amendments of 1984 (HSWA) require all facilities seeking a permit to undertake corrective action at all solid waste management units (SWMUs) from which there has been a release of hazardous constituents, regardless of the time the waste was placed in the unit. The schedule for corrective action will be specified by EPA in the federal portion of your upcoming RCRA permit.

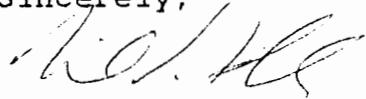
Dozens of SWMUs, including several land disposal units, identified by the RFA are not addressed in Kirtland's IRP. Further, the site investigations planned under the IRP appear to be inadequate to characterize the nature and extent of releases to the degree required by RCRA, and it is very likely that EPA will require further investigative activities at these sites. Mr. Richard Mayer of EPA's Region VI office is responsible for the federal portion of Kirtland's permit, and he is more than willing to work with you to ensure that any work performed under the IRP will satisfy corrective action standards. His telephone number is (214) 655-6785 and the mailing address is 1445 Ross Avenue, Dallas, TX 75202.



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Thank you for your continued cooperation. Please do not hesitate to call me at 827-0582 if I can be of further assistance.

Sincerely,



Nick Van Kleeck
Environmental Scientist
Hazardous Waste Section

cc: Richard Mayer, EPA Region VI
Colonel Peter Warn, KAFB EMD
Amy Childers-Lewis, EID-Superfund
Susanne Moore-Mayne, EID-Hazardous Waste