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Deputy Secretary

ENTERED

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April 5, 1989

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Peter W. Warn, Colonel
Department of the Air Force
Headquarters 1606th Air Base Wing (EM)
Kirtland Air Force Base, NM 87117-5000

Dear Colonel Warn:

I have reviewed the final draft workplan titled Installation Restoration Program, Phase II - Stage 2, Remedial Investigation and Feasibility Study, January 27, 1989 and the draft quality assurance project plan titled Installation Restoration Program Phase II - Stage 2 Quality Assurance Project Plan For Remedial Investigation and Feasibility Study at Kirtland Air Force Base Albuquerque, New Mexico, February 15, 1989, in the context of the RCRA regulations and guidance documents. I have reviewed only those sections in the workplan and the quality assurance project plan pertaining to the RCRA units: the two sewage lagoons, the golf course pond, and the golf course.

Based upon the details provided in the workplan and the quality assurance project plan, the groundwater monitoring system as outlined for the RCRA units is inadequate and does not fulfill the RCRA regulations and guidance documents. I have included more detailed comments in the attachment to this letter.

I strongly urge you to review and use the Technical Enforcement Guidance Document (TEGD) September 1986 and to adhere to the RCRA regulations in your revisions pertaining to the RCRA units. The groundwater monitor wells as outlined in your IRP workplan and quality assurance project plan would not provide representative samples of the groundwater affected by the RCRA units. Not only must an adequate groundwater monitoring system be installed, the uppermost aquifer must be characterized, the monitor wells must be sampled for four quarters to establish background water quality and Kirtland AFB must comply with the rest of the groundwater regulations in HWMR-5, Part VI, Section 265 for the RCRA units.

After reviewing my comments and the TEGD and the RCRA regulations, please submit a revised groundwater monitor well proposal specifically for these RCRA units as soon as possible.



Colonel Warn
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I am still reviewing the sampling and analysis portions of the quality assurance project plan and will provide my comments to you in 30 days.

If you have any questions or need additional information, please call me at 827-0170.

Sincerely,

A handwritten signature in cursive script that reads "V. Suzanne Moore-Mayne". The signature is written in dark ink and is positioned below the word "Sincerely,".

V. Suzanne Moore-Mayne
Water Resource Specialist II
Hazardous Waste Program

SM/sm

cc: Amy Lewis, EID Superfund Program