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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2738

SEP 26 1991

ENTERED

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Thomas A. Norris, Colonel
Environmental Management Division
United States Air Force
Headquarters 1606th Air Base Wing (MAC)
Kirtland Air Force Base, New Mexico 87117-5000

RECEIVED

OCT 3 1991

NM ENVIRONMENTAL DIVISION
OFFICE OF THE DIRECTOR

Dear Colonel Norris:

We hereby approve your RCRA Facility Investigation (RFI) Workplan for the Appendix I SWMU's. The approved RFI Workplan consists of the RFI Workplan NOD responses dated August 22 and September 11, 1991, and modifications made by the Environmental Protection Agency (EPA). The modifications to the RFI Workplan are:

1. Kirtland Air Force Base shall submit the RFI Report for the Appendix I SWMU's to EPA in Dallas one year from the date of this approval letter;
2. The investigation work for the Radioactive Burial Site, SWMU No. 6-30, shall be included in the Appendix II RFI Workplan, which is due (to EPA, Dallas) April 11, 1992.

In addition, we have enclosed some clarifying comments pertaining to the RFI Workplan.

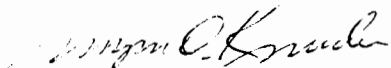
While reviewing the schedules in the RFI Workplan, Region 6 noticed that the date Kirtland had scheduled for the RFI Report (for the Appendix I SWMU's) was December 1993, which would be approximately two years from the date of this approval letter. The Region then researched RFI schedules at other comparable Federal Facilities (comparable in the number and type of SWMU's per RFI Workplan) in Region 6. The results of this research indicated that the longest time span between RFI Workplan approval and RFI Report due, was 12 months. Therefore, the Region is modifying the schedule in the RFI Workplan.

In addition, Kirtland omitted the investigation work for the Radioactive Burial site, SWMU number 6-30 in the HSWA permit. This SWMU was omitted in both the original and NOD submittal. Therefore, a modification was necessary.

KAFB1161

If you have any questions concerning this matter, please contact Richard Mayer of my staff at (214) 655-6775.

Sincerely yours,



Myron O. Knudson, P.E.
Director
Hazardous Waste Management Division

Enclosure

cc: Judith Espinosa, NMED

**CLARIFICATION COMMENTS ON THE KIRTLAND AFB
RFI WORKPLAN FOR APPENDIX I SWMU'S**

Site 11, Landfill No. 3; Site 12, Landfill C; Site 13, Abandoned Landfill; Site 14, Manzano Sewage Lagoons; Site 17, Fill area SE of Sewage Lagoons; Site 18, Unnamed Dump: Although the site specific investigation narratives of the RFI Workplan for these SWMU's indicates what types of samples will be taken (soil samples, etc.), the types of analysis to be done on those samples were omitted. However, page 102 (which is a summary table) of the workplan does indicate the number and what types of analyses will be done on those samples. Therefore, the Region interprets the information shown on this table as the types of analytical work done on the samples taken from those SWMU's.

Site 18, Unnamed Dump; Site 17, Fill area SE of Sewage Lagoons: Although the RFI Workplan requires near surface soil samples for these two SWMU's, it is highly unlikely that a no further action decision can be made on the results of those samples. Deeper soil samples will be required in a Phase II investigation.