



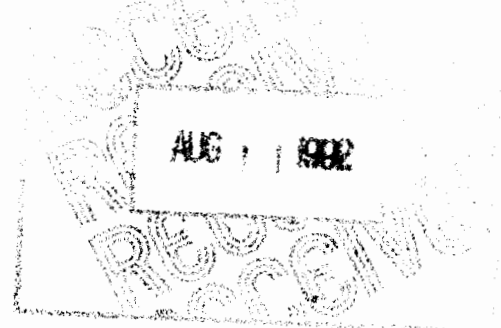
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2733

*Barbara
Stephens* KAFB
RED 92

AUG 07 1992



Thomas A. Norris, Colonel, USAF
Director
Environmental Management Division
Headquarters 542D Crew Training Wing (MAC)
Kirtland Air Force Base, New Mexico 87117-5000

Re: Stage 2B RFI Work Plan
Kirtland Air Force Base
NM9570024423

TH

Dear Colonel Norris:

The Environmental Protection Agency has completed a review of the RCRA Facility Investigation (RFI) work plan for phase 2B and found it to be deficient. A list of deficiencies is enclosed. A Sampling and Analysis Plan (SAP) and Health and Safety Plan should also have been included as part of the complete RFI work plan which was due on April 11, 1992. These two portions of the RFI work plan have not been received making the entire submittal late which is a violation of the HSWA permit. You have 30 days from receipt of this letter to submit these plans, as well as respond to the noted deficiencies.

The next report required under the HSWA permit is an RFI Report for the Appendix I SWMU's which is due on September 26, 1992 (refer to correspondence dated September 26, 1991 from EPA to Colonel Norris). Any changes in scheduled reports or work plans must receive approval from EPA.

Should you have any comments or additional questions, please contact Barbara Driscoll of my staff at (214) 655-6785.

Sincerely,

William K. Honker, P.E.
Chief
RCRA Permits Branch

Enclosure

cc: Benito Garcia, NMED

KAFB1244



DEFICIENCIES FOR RFI WORK PLAN PHASE 2B
KIRTLAND AIR FORCE BASE

General Comments: The format used for the work plan is disjointed. It would be preferable to have all the necessary information about each SWMU in one writeup, rather than being split into the four sections which are used in the work plan: specific environmental setting, data needs, site objectives and field tasks. At the very least, the two sections on site objectives and field investigations should be combined into one section which is a thorough explanation of all aspects of the investigation. An example of the information needed is: Boreholes will be used to determine if contamination has moved into the unsaturated zone. This many boreholes will be used and they will be located here for this reason (see diagram p1 for sampling locations). The boreholes will be drilled in this manner and to this depth for this reason. Samples will be collected every so many feet or this type of field screening will be used to determine where samples will be collected. Samples will be collected by this manner. These analyses will be conducted (refer to Table 1).

Analytical methods used should be discussed in a separate section prior to discussion of individual SWMUs, or this information should be referenced in each individual SWMU investigation, such as: Samples will be analyzed for metals, semi-volatiles and organics (see Table 1 for methods).

Diagrams are needed which show details such as the size of the SWMU, sampling locations, proposed well locations, borehole locations, etc. A diagram showing what kind of monitor well is going to be installed, and a description of that well is needed. How will the wells be developed and sampled?

Site 16, Radioactive Burial Site #11 - A diagram needs to be submitted detailing the location of all three horizontal directional test holes. Samples should be collected (as close as can be determined) under each of the nine trenches rather than at 150 foot intervals, or at a closer interval such as every 20 feet. The field screening mentioned in the work plan could be used to determine sample locations. If field screening indicates hazardous or radioactive contamination, a sample should be collected for analysis. Figure 2.2.1.1.1 shows 10 trench scars, while the text indicates only nine trenches. Why did you decide to drill the directional boreholes at a depth of 40 feet? More details are required in the work plan.

Site 22, Oil/Water Separators, Area Drains, Underground Storage Tanks, and Sewage Ejector Units - The work plan should describe how each unit will be investigated instead of only indicating that the number of soil gas sampling points and soil samples collected at each unit will be a function of the size of the unit, the type of waste that could discharge to the unit, and preliminary results of testing as field tests are completed. Similar types of units, and investigative techniques could be grouped in the investigative

discussion. A diagram should be presented for each unit, and text should indicate types of waste that might discharge to that unit. How is the soil gas survey to be conducted? Why is ST-262 the only site being analyzed for pesticides and PCB's?

Site 23, Silver Recovery Unit - It should be determined if the floor drain goes either to the city treatment plant or to the storm sewer system? Does the material going down the drain meet the necessary pretreatment standards if it goes to the city treatment plant? If the drain connects to the storm sewer, the sewer may be a SWMU. How often is the cartridge changed, and how is it determined that it needs to be changed? How will the location of the sample be determined, and how will it be taken?

Site 24, Building 617 - Piping Trench - A better diagram with details is needed of this site. How will the location of the boreholes be determined. If possible borehole locations should be shown on a diagram. Will screening be used to determine sample location, and if so, what type of screening method(s) will be used? If there are signs of contamination there should be contingency for collecting more than one sample per borehole.

Site 25, Building 617 - Dilution Pit - How much hydrochloric and sulfuric acid is added to the dilution pit? Air monitoring may be necessary for this unit. How are the fluids from the dilution pit transported to Site 26, the dilution pond? Is the water sampled to determine that neutralization has occurred prior to transportation. A separate diagram of the dilution pit and the locations of the proposed boreholes is needed. What types of field screening will be used to determine sample location? If there are signs of contamination there should be a contingency plan for additional samples or increasing the depth of the borehole.

Site 26, Building 617 - Dilution Pond - A diagram of the dilution pond and sampling locations is needed. What is an annual estimate for the amount of fluids this pond receives? Is the site secured? How will sediment sample locations be determined, and at what depth and by what method will they be collected? The same questions apply to the bore holes.

Site 27, Manzano Fire Training Area - A description of how the soil gas survey will be conducted should be included, as well as, a description of borehole installation and sample collection. A specific diagram of the site with sampling locations is needed.

Site 28, Building 20375 - Waste Oil Storage Tank, Auto Hobby Shop - Are there any records of spills or leaks from the tank? Please provide a detailed description of how the soil gas survey will be conducted, as well as, the borings and sampling.

Site 29, Building 20205 - Tank T-20215, AAFES Service Station - Same comments as for Site 28.