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GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850



JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

March 17, 1993

Colonel Thomas A. Norris
Director, Environmental Management
337th ABW
2000 Wyoming Blvd SE Suite 5659
Kirtland AFB, New Mexico 87117-5969

RE: REVIEW OF CLOSURE WORK CONDUCTED AT BUILDING 20423 BATTERY SHOP FRENCH DRAIN AND CONFIRMATION THAT 2/2/92 NOTICE OF DEFICIENCY (NOD) IS RESOLVED.

Dear Colonel Norris:

On February 12, 1993, The Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department (NMED) received an inquiry regarding the status of an NOD issued for the Building 20423 Battery Shop French Drain closure plan. The following chronology is written to address that concern. Secondly, HRMB has completed review of the results from the closure work conducted at the site and has included comments for your consideration.

Kirtland Air Force Base (KAFB) submitted a closure plan for Building 20423 Battery Shop French Drain dated May 12, 1989. NMED completed a review of said plan and issued an NOD dated December 31, 1991. The NOD required KAFB to submit a workplan to "assess the vertical and horizontal extent of solvent contamination in the area". In a meeting held January 21, 1992 between NMED and representatives from KAFB it was agreed that KAFB would also assess the extent of lead contamination from the unit. On March 5, 1992, NMED approved KAFB's work plan for additional investigations. A copy of this letter is included for your files. The approved workplan was added to the May 1989 closure plan and issued for public comment on November 5, 1992. This draft closure plan became the approved closure plan December 21, 1992.

It is HRMB's understanding that KAFB intends to demonstrate that a post-closure care permit is not required for the unit because the

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closure met the applicable HWMR-7, Part V, Section 40 CFR 264 standards for clean closure. After review of the closure work KAFB documented in the approved closure plan and in the reports following the workplan for additional investigations, HRMB has determined that further information is needed to determine whether or not clean closure has been achieved. Specific information requirements are as follows:

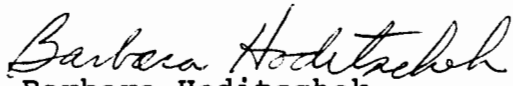
1. Analytical results from corehole sampling conducted in July, 1992 show that lead values in the analyzed samples varied from below 5.0 mg/kg to 11.0 mg/kg at depths ranging from 30 to 100 feet. KAFB must demonstrate that the vertical extent of lead contamination originating from the unit is known. It is suggested that KAFB sample to determine a site-specific background level for lead.

2. Summary table 3-2 for corehole sampling conducted in July 1992 shows detectable levels of Methylene Chloride in two samples from corehole SB-4 (6.0 ug/kg and 7.0 ug/kg at 20 and 40 feet respectively). KAFB must provide to NMED the analytical reports for those samples and a justification to support the conclusion that these detections were due to laboratory contamination.

Please submit your response to these comments within 30 days of your receipt of this letter. If, after all closure activities are complete, the closure meets the standards for closure by removal, NMED will grant clean closure of the unit and terminate interim status. If closure by removal standards are not met, the unit will be subject to the regulatory requirements of post-closure care.

If you have any questions regarding this matter, please contact Ms. Stephanie Stoddard of my staff at (505) 827-4308.

Sincerely,


Barbara Hoditschek
Program Manager, RCRA Permits

xc: Steve Alexander, HRMB
Ron Kern, HRMB

Enclosure: NMED Ltr, 3/5/92



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JUDITH M. ESPINOSA
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RON CURRY
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March 5, 1992

Col. Thomas A. Norris
Director, Environmental Management
Headquarters 1606 ABW/EM
Kirtland Air Force Base, NM 87117-5000

RE: NOTICE OF APPROVAL OF WORK PLAN FOR ADDITIONAL
INVESTIGATIONS AT BATTERY SHOP FRENCH DRAIN SITE

Dear Col. Norris:

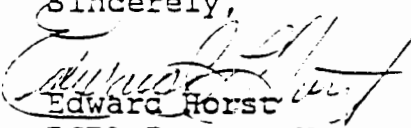
The Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department (NMED) received a Work Plan for the Battery Shop French Drain Site on March 1, 1992 from Kirtland Air Force Base (KAFB).

HRMB has reviewed said plan and is satisfied with the content.

This letter serves as official notification that KAFB has approval from HRMB to begin work under the aforementioned Work Plan.

Please contact Joseph Kennedy at (505) 827-4300 if you have any questions.

Sincerely,


Edward Horst
RCRA Program Manager

EH/jk

cc: Benito Garcia, Bureau Chief
Bruce Swanton, Technical Section Supervisor

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