



BRUCE KING  
GOVERNOR

*KAFB 93*  
State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
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*File KAFB / Red / 93*  
RECEIVED

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**MEMORANDUM**

TO: Edward Horst, RCRA Inspections & Enforcement Program  
Manager

THROUGH: Steve Alexander, RCRA Technical Compliance Program Manager *AW*  
*FE*  
*PO*

FROM: Ron Kern, RCRA Technical Compliance Program *RK*

DATE: December 21, 1993

SUBJECT: **Basic Evaluation of Analytical Data from the Mercury  
Spill Site (Building 30110), Kirtland Air Force Base,  
Albuquerque**

At the request of the Inspections and Enforcement Program, the Technical Compliance Program has evaluated the December 2, 1993 data package related to the "Mercury Spill Site" (Building 30110) at Kirtland Air Force Base (KAFB) in Albuquerque. The data package was prepared by Walter S. Darr III, Chief Compliance, Environmental Management Division, KAFB.

The data, presented within the text of the cover letter and attached from Albuchemist, Inc., relate to both total Mercury (Hg) and TCLP Hg. All the analytical data presented indicate that TCLP sample results do not exceed the acceptable TCLP Compliance Criteria for Hg (0.2 mg/L).

Total Hg concentrations for the sample from inside the discharge pipe (Albuchem 102093-9A) at 159 mg/l and one sample from the outfall (Albuchem 102093-9B) at 56.8 mg/l are relatively high levels. Although these concentrations exceed the health-based action level for Hg in soil (20 mg/kg), as listed in Subpart S Guidance for HSWA Permit Actions, KAFB is proposing to remove the contaminated materials and transport them as nonhazardous waste to the Rio Rancho Landfill, an interim status facility (per the Solid Waste Bureau).

Relevant regulations are contained within the Land Disposal Restrictions of 40 CFR Part 268. Because the pertinent concentrations of Hg (waste code D009) are less than 260 mg/kg (low Hg subcategory), the regulated level (TCLP) for a non-wastewater extract, as listed in Table CCWE (0.20 mg/L) of 40 CFR 268.41(a), has not been exceeded.

Because no regulatory limits have been exceeded, the Hg-

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contaminated materials are not regulated as RCRA hazardous waste. If the Rio Rancho Landfill will accept these materials, which Walt Darr has informed me that they would, then KAFB may dispose of these Hg-contaminated media accordingly.

KAFB should be aware that cleanup of the contaminated media at the Hg Spill Site (Building 30110) should be sufficient to ensure that any remaining materials do not exceed either a facility-generated, risk-based action level or the Subpart S guidance action level for Hg in soil (20 mg/kg).

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