



KAFB 94

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 377TH AIR BASE WING (AFMC)

file KAFB
111 Feb 94

11 April 1994

377 ABW/EM
2000 Wyoming Blvd SE
Kirtland AFB NM 87117-5659

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ENTERED

Mr. William Honker
Chief, RCRA Permits Branch
U.S. EPA Region 6
1445 Ross Ave, Ste 1200
Dallas TX 75202-2733

Dear Mr. Honker

This letter constitutes a Notice of Class I Modification to the Kirtland Air Force Base (KAFB) RCRA HSWA Permit.

The changes for Solid Waste Management Unit (SWMU) 6-30 and Area of Concern (AOC) 6-A represent the incorporation of these sites into a new Appendix IV. The SWMU 6-30, Radioactive Burial Site No. 11 (RB-11) was transferred to Appendix II from Appendix I in a Class I modification, dated 17 June 1992, and was included in the Stage 2B Work Plan approved on 8 June 1993. Radioactive Burial Site No. 7 (RB-7), part of the Appendix II AOC, was included in the Stage 2C Work Plan submitted on 31 January 1994. The Stage 2B RFI report must be submitted to your office no later than 8 December 1994. The Stage 2C RFI report must be submitted 18 months after the work plan is approved. Both radioactive burial sites have the potential for mixed waste. By combining them into a new Appendix IV, with a RFI due on 8 December 1994, KAFB will be accelerating the schedule for RB-7. In addition, if problems are encountered during the investigation of these sites, the schedule for completing the Stage 2B and Stage 2C RFIs will not be impacted.

There are five emergency holding tanks located at the Manzano Weapons Storage Area. These tanks, Radioactive Burial Sites RB-4, RB-5, RB-6, RB-8, and RB-9, are part of AOC 6-A. Although records do not indicate the tanks were used as designed, the EPA denied KAFB's request to delete them from the permit via a Class III permit modification. When recent investigations indicated there was free liquid in some tanks, EPA directed KAFB to investigate the tanks. Due to the similarity of potential contaminants and use, these tanks will be transferred to the new Appendix IV. The RFI report for the tanks will be due 18 months after approval of the work plan, which must be submitted to EPA no later than 31 May 1994.

KAFB1397



In order to more effectively manage the investigation of the SWMU and AOC specified in the permit, the following modifications are necessary:

- a. Move SWMU 6-30, RB-11, from Appendix II to Appendix IV.
- b. Move AOC 6-A, specifically RB-4, RB-5, RB-6, RB-8, and RB-9, from Appendix II to Appendix IV.

This Class I modification will be sent to the interested persons on KAFB's mailing list per 40 CFR 170.42a and 40 CFR 124.10c.

If you have any questions, please contact Mr. Christopher DeWitt, 377 ABW/EMR, (505) 846-2773/0053.

Sincerely



THOMAS A. NORRIS, Colonel, USAF
Director
Environmental Mgmt Division

cc:
NMED H&RMB (Ms. Hoditschek)
KAFB EPC Members
BC/KAFB EWG Members
HQ AFMC/CEVR