



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

RON K —
BARBARA H —

JUN 14 1995



Mr. Christopher DeWitt, R.P.G., Chief
Restoration Branch
Environmental Management Branch
377 ABW/EMR
2000 Wyoming Boulevard SE
Kirtland AFB, NM 87117-5659

ORIGINAL PLACED
IN ASWA FILE ✓
6/28/95
SP.

Dear Mr. DeWitt:

The Environmental Protection Agency (EPA) has reviewed your May 26, 1995 site-specific sampling plan for RW-68, Radium Dump/Slag Piles and has found the plan to be incomplete. Please respond to the attached questions within 30 days of receipt of this letter.

If you have any questions, please contact Nancy Morlock of my staff at (214) 665-6650.

Sincerely yours,

David W. Neleigh
David W. Neleigh, Chief
New Mexico/Federal Facilities
Section

Enclosure

cc: Mr. Benito Garcia
New Mexico Environment Department
Mr. Steve Pullen ✓
New Mexico Environment Department

KAFB1639



EPA Comments
Site-Specific Sampling Plan for the Radium Dump and Slag Piles
Kirtland Air Force Base

Section 3.0, RCRA Facility Investigation (RFI) Sampling Plan

General Comments

1. Once approved, the investigation at the radium dump/slag piles should follow the approved Stage 2C/Appendix III, unless the Base-Wide Plans, submitted by Kirtland Air Force Base (KAFB) in March 1995, have been approved by EPA and NMED.
2. What criteria does KAFB propose to use to determine when the extent of contamination has been fully delineated at these sites?

Cratering Area

1. EPA understands that the Cratering Area is a 42-acre site. Given the size and historical use of the site, more than ten sampling locations may be needed. Please explain the rationale for the proposed sampling plan. Is there a statistical basis for the proposed sampling plan? KAFB should submit a map depicting the proposed sampling locations, the background sampling location, and the "other disturbed" sampling locations.
2. More site information, including background information, is needed. For example, KAFB proposes to sample from "the five largest detonation pits on the site." How many detonation pits are located on this site? At what depths did the test explosions take place? Why are gross alpha and gross beta samples being collected at this site? How will KAFB address the potential for unexploded ordnance?
3. Copies of site photographs, if available, would be helpful.

Slag Piles

EPA is requiring that KAFB complete a stabilization action at the slag piles. Because the piles may be a source for continued contamination of this site, EPA is requiring that the piles be removed and properly disposed of. KAFB should submit a site-specific plan for this stabilization action.