



FACSIMILE TRANSMITTAL

**U.S. EPA REGION 6
HAZARDOUS WASTE MANAGEMENT DIVISION
1445 ROSS AVENUE
DALLAS, TEXAS 75202-2733**

TO:	STEVE PULLEN - NMED	
MACHINE NUMBER:	(505) 827-1544	VERIFICATION NUMBER: ()
FROM:	Nancy Rinehart Morlock EPA Region 6 RCRA Permits Branch New Mexico and Federal Facilities Section	
PHONE:	(214) 665- 6650	MAIL CODE: 6PD-N
OFFICE:	6.054	
DATE:	9/21/95	PAGES, INCLUDING COVER SHEET: 4
PLEASE NUMBER ALL PAGES		
INFORMATION FOR SENDING FACSIMILE MESSAGES		
OUR EQUIPMENT	FACSIMILE NUMBER	
PANAFAX UF-766	(214) 665-2164	
COMMENTS: Steve: Attached is a draft NOD on Kirtland's response to the Stage 2B RFI Report Notice of Deficiency. Please review and call with any questions or comments. I plan to issue the NOD within 2 weeks (10/5/95). Thanks! Nancy		
Copies to:		

KAFB1675



CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Scott E. Streifert, Colonel
Director, Environmental Management Division
377 ABW/EM
2000 Wyoming Boulevard SE
Kirtland AFB, NM 87117-5659

Dear Colonel Streifert:

The Environmental Protection Agency (EPA) has completed a technical review of your response to the Stage 2B Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Report notice of deficiency, dated July 5, 1995, and has determined that the report is deficient. Enclosed is a list of deficiencies and comments for your review.

A revised report addressing the enclosed deficiencies must be submitted to EPA within 90 days of receipt of this letter. If you have any further questions, please contact Nancy Morlock of my staff at (214) 665-6650.

Sincerely yours,

David Neleigh, Chief
New Mexico/Federal Facilities
Section

Enclosure

cc: Benito Garcia
New Mexico Environment Department

NMORLOCK:6PD-N:5-6650:09/21/95:F:\USER\NMORLOCK\KIRT2BRP

**Notice of Deficiency
Kirtland Air Force Base
Stage 2B RFI Report**

General Comments

1. For future investigations, Kirtland should complete soil boring logs and PID/FID readings for all borings. Each boring log should identify all visual and olfactory contamination and the interval that the contamination is located. Failure to complete a boring log may result in a requirement to install additional borings.
2. For future reports, Kirtland should include all oil/water separator (OW/S) removals (or any removal of a SWMU) and the associated soil verification sampling within the RFI report as a stand alone document. Also, any periodic monitoring of a SWMU should be discussed and included in the report.

Specific Comments

1. **Page NOD-1; Response to Comment 2**
Kirtland mentions removing the silver recovery unit but failed to mention when Kirtland will remediate the drains and send the sampling report to EPA and NMED. Please provide this information in the revised report.
2. **Page NOD-7; Response to Comments**
The monitoring plan was not found in the document titled "Closure Report for the Oil/Water Separator Removals and Repair at Kirtland Air Force Base, New Mexico". Please include the plan in the revised report. The monitoring plan should address all current and newly installed OW/Ss and any SWMUs associated with the OW/Ss, such as underground tanks, etc. Also, the "Closure Report..." did not include the soil sampling locations for each oil/water separator removed/repared and the associated soil logs/PID readings. EPA cannot tentatively agree to a no further action decision on these SWMUs without this information. Please include this information in the revised report.
3. **Pages NOD-7 thru NOD 20; Response to Comments 23, 21, 25, 27, 36, 59, 62, 65, 68, 70, 74, 75, 91, 94, 99, 102, 105, 108, 109, and 114**
Please indicate when the sampling results discussed in these comments will be submitted to EPA and NMED.
4. **Page NOD-11; Response to Comment 48**
EPA cannot locate the referenced revisions in the report. Also, please indicate when the soil sampling results will be sent to EPA.

5. **Page NOD 16; Response to Comment 79**
Please include a periodic monitoring plan for this SWMU in the revised report.
6. **Page NOD-16; Response to Comment 82**
An additional soil sample shall be collected at ST-248-04 to confirm whether contamination is present.
7. **Page NOD-17; Response to Comment 85**
An additional soil sample shall be collected at ST-250-01 to confirm whether contamination is present.
8. **Page NOD-19; Response to Comment 106**
Is Kirtland going to remove this unit or modify the construction of the unit? If scheduled for removal, please indicate when the sampling results will be sent to EPA and NMED.