

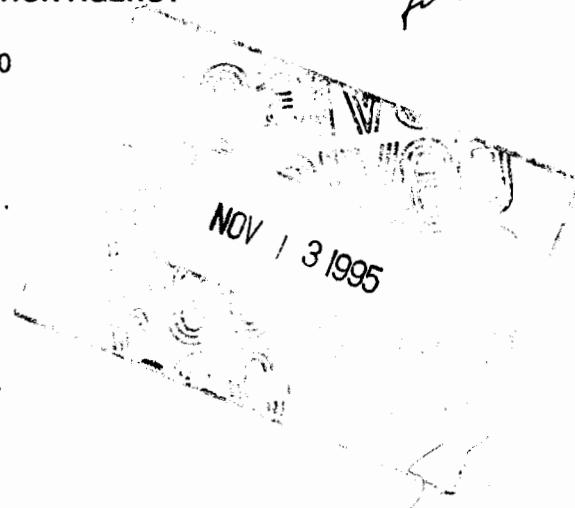


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

NOV 09 1995

Steve R. [initials]  
Kirk [initials] RAK  
Baker [initials]



**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

**RE: RCRA Facility Investigation (RFI) Phase II Workplan for the Appendix II SWMUs, Kirtland Air Force Base, NMD9570024423**

Dear Colonel Streifert:

The Environmental Protection Agency (EPA) has completed a technical review of your August 14, 1995, Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Phase II Work Plan for the Appendix II solid waste management units, and has determined that the work plan is deficient. Enclosed is a list of deficiencies for your review.

A revised work plan addressing the deficiencies must be submitted to EPA and the New Mexico Environment Department within 90 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 Neleigh*  
David Neleigh, Chief  
New Mexico and Federal  
Facilities Section

Enclosure

cc: Mr. Benito Garcia  
New Mexico Environment Department



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## 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: 5	
<b>PLEASE NUMBER ALL PAGES</b>		
INFORMATION FOR SENDING FACSIMILE MESSAGES		
OUR EQUIPMENT	FACSIMILE NUMBER	
PANAFAX UF-766	(214) 665-2164	
COMMENTS: Steve: Attached is a draft NOD on the Stage 2B/Appendix II Phase II RFI Workplan for Kirtland. The requirement for a Phase II Workplan was a part of the NOD originally issued by EPA on the Stage 2B RFI Report. Please review and call with any comments or questions. I plan to issue this NOD within the next 2-3 weeks (by 10/11/95). Thanks, Nancy		
Copies to:		

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Director, Environmental Management Division  
377 ABW/EM  
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Kirtland AFB, NM 87117-5659

RE: RCRA Facility Investigation (RFI) Phase II Workplan for the  
Appendix II SWMUs, Kirtland Air Force Base, NMD9570024423

Dear Colonel Streifert:

The Environmental Protection Agency (EPA) has completed a technical review of your August 14, 1995 Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Phase II Workplan for the Appendix II solid waste management units (SWMUs), and has determined that the Workplan is deficient. Enclosed is a list of deficiencies for your review.

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Sincerely yours,

David Neleigh, Chief  
New Mexico/Federal Facilities  
Section

Enclosure

cc: Benito Garcia  
New Mexico Environment Department

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**Notice of Deficiency  
Kirtland Air Force Base  
RFI Phase II Workplan for Appendix II SWMUs**

**General Comments**

1. All soil borings must be logged with the appropriate soil descriptions and all olfactory or visual contamination must be identified in the log. Also, the boring logs must indicate the PID/FID readings at various locations vertically in the boring.
2. Kirtland refers in the workplan to the Stage 2C DQAP (USAF, 1994) document on sampling procedures for the Geoprobe. Are these sampling procedures the same as those implemented in the Stage 2B investigation? If they are different, please include this document in the revised Workplan.
3. Please include a schedule for the activities to be performed in this Workplan and the date that the RFI Report will be submitted to EPA and the New Mexico Environment Department (NMED).
4. Please include in the revised Workplan the certification statement required by EPA for all RFI documents.

**Specific Comments**

1. **Sites St 202, Sediment Trap and ST-203, Oil/Water Separator (SWMU 10-7)**
  - a. If significant visual or olfactory contamination is noted, then Kirtland must also analyze the sample(s) for VOCs and SVOCs.
  - b. Kirtland shall sample all soil zones that are visually or olfactory contaminated which were not in the pre-selected sampling intervals. For example, if the pre-selected sampling intervals (from the Workplan) were 2, 7, 12, and 22 ft. and there was obvious contamination at 15-20', then that zone must be sampled.
2. **Site ST-210, Oil/Water Separator, Holding Tank, and Fuel Filter Rack (SWMU 10-7)**
  - a. Kirtland should not use the Oil/Water Separator and holding tank until the source of the leak(s) are stopped.
  - b. Page 3-13; second paragraph: Kirtland must sample each contaminated zone located outside of a pre-selected sampling interval and have it analyzed for the full analysis. Using pre-selected zones is acceptable, however; not sampling obviously contaminated zones is

unacceptable.

- c. What are the timeframes to complete each phase of the investigation? Does Kirtland intend to submit the Phase I results to EPA and NMED for review?

**3. Site ST-211, Oil/Water Separator (SWMU 10-7)**

- a. Kirtland should sample all soil zones that are visually or olfactory contaminated which were not in the pre-selected sampling intervals. For example, if the pre-selected sampling intervals (from the Workplan) were 2, 7, 12, and 22 ft. and there was obvious contamination at 15-20', then that zone must be sampled.
- b. If visual or olfactory contamination is found, then Kirtland must also analyze the sample(s) for VOCs, SVOCs, and metals.

**4. Site ST-215 Oil/Water Separator**

Page 5-11; second paragraph: Kirtland should sample all soil zones that are visually or olfactory contaminated which were not in the pre-selected sampling intervals. For example, if the pre-selected sampling intervals (from the Workplan) were 2, 7, 12, and 22 ft. and there was obvious contamination at 15-20', then that zone must be sampled.

**5. Site ST-219, Oil/Water Separator (SWMU 10-7)**

- a. Page 6-37; 1st paragraph: Kirtland should sample all soil zones that are visually or olfactory contaminated which were not in the pre-selected sampling intervals. For example, if the pre-selected sampling intervals (from the Workplan) were 2, 7, 12, and 22 ft. and there was obvious contamination at 15-20', then that zone must be sampled.
- b. Please include the time schedules for each phase in the revised RFI Workplan.

**6. Site St-221, Oil/Water Separator and Inflow (Waste) Lines (SWMU 8-13)**

If obvious contamination is found, then Kirtland must also analyze the sample(s) for VOCs, SVOCs, and metals.

**7. Site ST-265, Oil/Water Separator (SWMU 10-7)**

If obvious contamination is found, then Kirtland must also analyze the sample(s) for VOCs, SVOCs, and metals.

**8. Site ST-266, Area Drain (SWMU 10-2)**

Page 13-8; Work Plan Rationale: If obvious hydrocarbon contamination is found, then Kirtland must analyze the sample(s) for VOCs and SVOCs.

9. Sites ST-271, Neutralization Pit (SWMU 9-15); and ST-272, Evaporation/Infiltration Pond (SWMU 9-16)

Page 14-11; Work Plan Rationale: Kirtland mentions field screening for contamination. Is the field screening for metals or other contaminants? Please clarify.

10. Site FT-14, Manzano Fire Training Area (MFTA), (SWMU 6-32):

Page 15-3; 2nd paragraph: Soil samples shall not be composited during the Phase II investigation.