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

<b>TO:</b>	STEVE PULLEN - NMED	
<b>MACHINE NUMBER:</b>	(505) 827-1544	<b>VERIFICATION NUMBER:</b> ( )
<b>FROM:</b>	Nancy Rinehart Morlock EPA Region 6 RCRA Permits Branch New Mexico and Federal Facilities Section	
<b>PHONE:</b>	(214) 665- 6650	<b>MAIL CODE:</b> 6PD-N
<b>OFFICE:</b>	6.054	
<b>DATE:</b>	12/6/95	<b>PAGES, INCLUDING COVER SHEET:</b>
<b>PLEASE NUMBER ALL PAGES</b>		
<b>INFORMATION FOR SENDING FACSIMILE MESSAGES</b>		
<b>OUR EQUIPMENT</b>	<b>FACSIMILE NUMBER</b>	
PANAFAX UF-766	(214) 665-2164	
<b>COMMENTS:</b> Steve: Attached is a copy of the NOD on the Basewide Plans for Kirtland Air Force Base. Call if you have any questions. By the way, Saturday is my big 3-0 birthday. I wear a size 2 and look best in jewel tones. Pass the word. Thanks, Nancy		
<b>Copies to:</b>		

KAFB1700



NOV 09 1995

**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 reviewed the Kirtland Air Force Base (KAFB) Basewide Plan, dated March 3, 1995, and found it to be deficient. A response to the enclosed deficiencies shall be submitted within 75 days of receipt of this letter.

Please note that final comments from the New Mexico Environment Department, Hazardous and Radioactive Materials Bureau, have not been received. Additional comments regarding the Basewide Plan may therefore be submitted at a later date.

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

Sincerely yours,

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

Enclosure

cc: Mr. Benito Garcia  
New Mexico Environment Department

NMORLOCK:6PD-N:5-6650:11/07/95:F:\USER\NMORLOCK\BASEWIDE.KFB

**Notice of Deficiency  
Kirtland Air Force Base  
Basewide Plans**

The Environmental Protection Agency (EPA) has completed a review of the March 3, 1995 Basewide Plan submitted by Kirtland Air Force Base (KAFB). The attached deficiencies shall be addressed within 75 days of receipt of this letter.

**GENERAL COMMENTS**

1. The Basewide Plan indicates that aquifer permeability will be evaluated by using single well permeability tests (slug tests). Conducting only slug tests is inadequate because of the complex geology beneath KAFB and the fact that slug test permeability values are only applicable for a small volume of an aquifer. The RFI Basewide Plan shall therefore be modified state that more rigorous testing procedures, such as multiple well pump testing, will be conducted.
2. Please discuss the decision logic for proposing no further action, or for proposing corrective measures studies.

**SPECIFIC COMMENTS**

1. Volume I, Section 3.2, Page 2 of 2  
The Basewide Plan indicates that data summaries will be included with each progress report. EPA may periodically request copies of all raw data and associated quality control (QC) documentation, in addition to the data summary tables presented in the quarterly progress reports. Therefore, this section shall be modified to state that raw data and QC documentation will be made available to EPA, upon request.
2. Volume II, Part I, Section 1.0, Page 1 of 2, Paragraph 2  
The terms "interim remedial action" and "remedial action" are used incorrectly. These terms shall be replaced with "interim measure" and "corrective measures", respectively.
3. Volume II, Part I, Section 4.1, Page 1 of 10, Paragraph 2  
The word "extrusive" is used incorrectly. It should be replaced with the word "nonintrusive."
4. Volume II, Part I, Table 4-1, Conduct Initial Field Data Collection Program  
Neither this table nor Part II, Section 4.0, specifies the data quality level (analytical support level) and the associated sample type and purpose. The Basewide Plan must specify each sample type and its associated data quality level.

**SUMMARY OF ISSUES TO BE INCLUDED IN  
PROJECT-SPECIFIC SAMPLING PLANS**

The Basewide Plan shall be modified to include a section describing the following information, which will be included in all future project-specific sampling plans:

- Current conditions
  - Nature and extent of contamination
  - Implementation of interim corrective measures
- Characterization of sources and contaminants
- Identification of potential receptors
- On-going facility-wide projects, as appropriate.
- Facility background information
  - Topography and surface drainage map
  - Location of all production and ground water monitoring wells
  - Location of any injection wells onsite or near the facility
  - All known past hazardous waste treatment, storage, or disposal areas, regardless of whether they were active on November 19, 1980
  - All known past and present underground waste storage tanks or piping
  - Uses of surrounding land
  - All tanks, buildings, utilities, paved areas, easements, and rights-of-way (and areas other than major facilities shown on Figure 2-2 of the base-wide plan)
  - History and description of operation, generation of solid and hazardous waste, and activities related to treatment, storage, and disposal
- Spills of product and waste
  - Approximate dates
  - Materials and amounts spilled
  - Locations
  - Response actions taken
- Summary of permits requested and/or received
  - Enforcement actions taken and subsequent responses
- Air and water quality
- Data quality level (analytical support level) of the Field Data Collection Program, and the associated sample type and purpose (initial and subsequent sample data must be of the same data quality level.)
- Thorough presentation and discussion of data comparison and the selected statistical methods

- Detailed description of procedures for aquifer testing and data analyses. Pump tests should be emphasized over slug tests as the preferred method to determine aquifer characteristics.
- Pertinent SOPs detailing all tasks associated with each specific investigation. Precision objectives for appropriate field instruments should be addressed.
- SOPs and data validation guidelines for all nonstandard analytical methods.
- Detailed descriptions of all preinvestigation nonintrusive sampling or assessment activities, and data reduction and interpretation activities, including relevant SOPs
- Detailed descriptions of all statistical methods and procedures to be used to (1) determine the minimum number of samples; (2) determine sample locations; and (3) compare sample results.
- Descriptions of all sampling equipment to be used during all investigative activities (this requirement is intended to prevent the use of incorrect sampling equipment, such as the Waterra pump for collection of VOC samples.)