

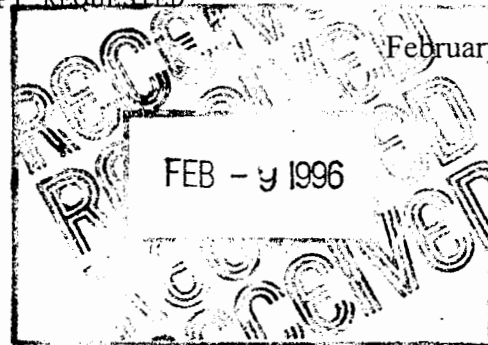


DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 377TH AIR BASE WING (AFMC)
CERTIFIED MAIL: Z 142 825 502
RETURN RECEIPT REQUESTED

February 5, 1996

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

Mr. David W. Neleigh, Chief
New Mexico and Federal Facilities Section
U.S. EPA Region 6
1445 Ross Ave, Ste 1200
Dallas TX 75202-2733



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Dear Mr. Neleigh

The EPA approved our Appendix I RFI Report with modifications. We have attached our response to the comments. We cannot address many of the EPA's comments at this time, and cannot include them as part of the Base-Wide Plans. We are particularly concerned about your request for additional background, geologic, and hydrogeologic information, and risk assessment discussions and diagrams.

As you are aware, KAFB is partially funding a Department of Energy (DOE) effort to complete a base-wide soils background study, hydrogeologic characterization, and future use plan. We anticipate completion of the three projects by December 31, 1996. We believe the resultant reports will provide the information requested and should be treated as addenda to the Base-Wide Plans. Discussions on the site-specific applicability of this information can be provided in the Phase 2 RFI Report. We will, however, submit a Sampling and Analysis Plan (SAP) that will outline the additional characterization planned for Phase 2 activities at the Appendix I SWMUs.

The USGS contract for Appendix I activities has expired and funds are no longer available for their continued involvement. Therefore, we will task Foster Wheeler Environmental, Inc. (FWE) with future Appendix I RFI activities. Foster Wheeler will also have to address any additional concerns regarding data quality, an unanticipated activity with an associated increased level of effort. We request these concerns be addressed as part of the Phase 2 RFI report or in a separate submittal. We would coordinate a due date (see below) with the EPA upon receipt of FY96 DERA funds.

Upon EPA and NMED approval, the Base-Wide Plans, written by FWE and submitted in March 1995, will be used as the generic work plans for *all* future KAFB restoration activities. We have and concur with EPA and NMED comments on these plans and will incorporate them into the final draft. When this is done, the plans will serve as the required planning documents for the Appendix I Phase 2 RFI work.

KAFB1728



Based on previous EPA correspondence, we identified a Defense Environmental Restoration Account (DERA) project for FY96 to conduct additional investigations at Appendix I SWMUs. Our major command validated this budget project; we expect funding by February 15, 1996. As part of our project submittal, we identified anticipated levels of effort for each SWMU and required report submittals, including a field SAP and Phase 2 RFI Report. However, as of this date, we have received no funding for *any* Appendix I activities. We anticipate the Corps of Engineers can award the contract to FWE within 45 calendar days after receiving funds.

We are reviewing the draft Phase 2 RFI SAP; however, we cannot submit it to the EPA and NMED until we receive funds for the Corps' review and FWE's update. Also, no other Appendix I work can start without funds.

We did not anticipate or budget for the EPA's requiring a separate Appendix I Phase 2 RFI work plan. We therefore request you waive this requirement, pending approval of the Base-Wide Plans and the SAP, with submittal based upon receipt of funds.

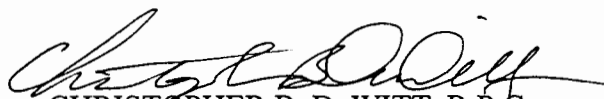
Because of the delay in funding, we request the EPA grant submittal extensions as follows:

| <u>DOCUMENT</u> | <u>EXTENSION</u> <u>(after funds award)</u> |
|---------------------------------------|--|
| Appendix I Phase 2 RFI SAP (draft) | 60 days |
| Base-Wide Plans (draft final) | 90 days |
| Appendix I Phase 2 RFI Report (draft) | 18 months** |

** Allows us to request FY97 funds

Please call me at (505) 846-0053 if you have any questions, comments, or concerns.

Sincerely


CHRISTOPHER B. DEWITT, R.P.G
Chief, Restoration Branch
Environmental Management Division

Attachment:
Response to Comments

cc:
NMED-HRMB (Mr. Pullen)
FWE (Mr. Weber)
USACE Omaha (Mr. Janis)
AFMC/CEVR (Mr. Dodyk)