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

JUN 07 1996

Mr. Benito Garcia, Chief
Hazardous and Radioactive Bureau
New Mexico Environment Department
P.O. Box 26110
Santa Fe, New Mexico 87502

RE: Response to the NOD Comments on the Stage 2D-1 RCRA Facility Investigation (RFI) Report, Kirtland Air Force Base, NMD9570024423

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has completed a review of Kirtland's Response to the NOD Comments on the Stage 2D-1 RFI Report received January 26, 1996, and offer the enclosed comments.

EPA recommends that NMED require Kirtland to address the enclosed comments in the revised RFI Report. If you have any further questions, please contact Mr. Rich Mayer at (214) 665-7442.

Sincerely yours,

David Neleigh, Section Chief
New Mexico - Federal Facilities

Enclosure

KAFB1771

EPA's Comments Pertaining to Kirtland's NOD
Response on the Stage 2D-1 RFI Report

General Comment: Kirtland omitted the arsenic soil analysis from the report, please include them in the revised report.

General Comment: At site RB-11, there are sporadic elevated nickel levels in some of the soil borings (RB-11-19, RB-11-22), RB-11-26, RB11-28, RB-11-30, RB-11-31, RB11-36, RB-11-85); however, most of these occur in only one sampling interval of the boring and there is not pattern to these occurrences. These nickel occurrences have been noted in other RFI reports submitted by Kirtland. Please clarify/justify whether these occurrences are due to: laboratory error; natural strata elevated in nickel concentrations; or contamination from waste disposal.

Page 4; Response 4: Soil samples in the excavated pits (RB-07) should go deeper than 1 foot, preferably 5 feet. Also, samples should be analyzed for semivolatiles in the pits and in the mounds. Soil samples taken for volatile analysis should not be homogenized or taken from a bucket auger. In addition, several of the metal analysis were omitted from Table 5-2, please include them in the revised report.

EPA questions the validity of the selenium soil analysis for site RB-07. Of the thirteen samples analyzed (including the background sample), the range in concentrations varied only from 98.1 ppm to 99.4 ppm. Of the approximate 150 samples taken at site RB-11, selenium concentrations were non-detect in both the background and active samples.

If the soil analysis are found to be valid, then either the soils in this area are naturally high in selenium or the site has been contaminated. Please include an explanation for the selenium concentrations in the revised report.