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

Ste -
Please forward these comments to KAFB by 12/12/97
Sandra
11/12/97

ENTERED

November 4, 1997

Mr. Benito Garcia, Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044A Galisteo Street
Santa Fe, NM 87505

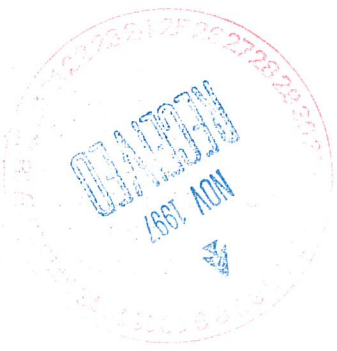
Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has completed its review of the Kirtland Air Force Base (KAFB) RCRA Facility Investigation, Sampling and Analysis Plan, Solid Waste Management Units RW-68 and SS-69, Final Draft, December 1996. Based upon the information presented in the report, the EPA found the Sampling and Analysis Plan to be incomplete. EPA's comments are attached for your review and consideration. EPA agrees with KAFB's recommendation to conduct confirmatory sampling on both sites to fully delineate the horizontal and vertical extent of subsurface solid contamination. If you have any questions or need additional information, please contact Debra Tellez of my staff at (214) 665-8140.

Sincerely,

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

Enclosure



KAFB1904

Kirtland Air Force Base
RCRA Facility Investigation, Sampling and Analysis Plan
Solid Waste Management Units RW-68 and SS-69
Final Draft, December 1996

GENERAL

1. A sampling strategy for the arroyos should be provided due to its proximity to the SWMUs. Source: Best Professional Judgement (BPJ).

2. The report mentions, qualitatively, the levels of contamination discovered in the Phase I RFI, but never provides the real numbers. The actual numbers should be provided to help define the magnitude of the problem at hand. Source: BPJ.

3. The plan needs to describe site geology and hydrogeology, including a description of the vadose zone. Source: BPJ.

4. Specific sampling locations should be identified. Source: BPJ.

5. The possible human health exposure pathways should be addressed. Source: BPJ.

6. Additional information is needed on the relief/slope of the area. Source: BPJ.

SPECIFIC COMMENTS:

1. SWMU RW-68: More information on how the slag was formed, what original materials formed the slag, and how the slag has deteriorated since formation (1940s) should be included in the plan. The plan needs to include a chemical analysis of the slag. Soil/sediment geochemistry of the site needs to be evaluated to understand the breakdown of the slag in-solution, and the potential for subsurface contaminant migration. Source: BPJ.

2. SWMU RW-68 , Page 5, Para 2.1: A more detailed explanation is needed on the origin of radium-22. The actual background levels of radium-22 should also be provided. Source: BPJ.

3. SWMU SS-69, Page 11, Para. 3.2 Results of Previous Investigations: Since SWMU SS-69 is within the Defense Nuclear Weapon School Training Site 6, further clarification is required to indicate that TS-6 is a separately listed IRP site and is not included in this confirmatory sampling event. Also, it should be clarified that SWMU SS-69 is an inactive training site. Source: BPJ.

4. SWMU SS-69, Page 11, Para. 3.1 Site Background and Environmental Setting: Additional site history information should be provided, in particular, time frame of actual contamination and applicable data from the 1985 radiological survey of the nuclear training sites. Source: BPJ.