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PETER MAGGIORE  
SECRETARY

July 31, 2002

Mr. Mark Holmes  
Environmental Management Division  
377 CES/CEVR  
2050 Wyoming Blvd, Suite 122  
Kirtland AFB, NM 87117

**RE: COMMENTS ON THE DRAFT PHASE 3 SAMPLING AND ANALYSIS  
PLAN FOR SOLID WASTE MANAGEMENT UNIT ST-341, JUNE 2002  
CONDENSATE HOLDING TANK AND EVAPORATION POND  
KIRTLAND AIR FORCE BASE  
EPA ID# NMD9570024423  
HWB-KAFB-02-023**

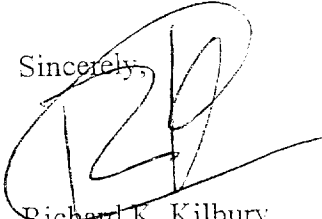
Dear Mr. Holmes:

The New Mexico Environment Department has reviewed the draft *Resource Conservation and Recovery Act Facility Investigation Phase 3 Sampling and Analysis Plan for Corrective Action Unit ST-341, Condensate Holding Tank and Evaporation Pond, Building 1033*. Presented below are comments and recommendations that NMED considers to be beneficial in terms of achieving the goal of no-further-action status at Site 341. When the final SAP is issued, NMED will issue a request for supplemental information, if necessary. If the attached comments are adequately addressed in the final SAP, NMED anticipates that the document would be approved without further comment.

NMED appreciates the opportunity to review draft planning documents because an early review promotes communication and accelerates the corrective action process. Should you have any questions regarding these draft comments, please contact me at (505) 846-0053.

Mr. Mark Holmes  
July 31, 2002  
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Sincerely,

A handwritten signature in black ink, appearing to read 'R. Kilbury', written over the word 'Sincerely,'.

Richard K. Kilbury  
Project Leader

Enclosures

cc: J. Bearzi, NMED HWB  
L. King, EPA Region 6, 6PD-N

~~File: KAFB, HSWA, Appendix III, 2002~~

1528 002

**DRAFT PHASE 3 SAMPLING AND ANALYSIS PLAN  
SOLID WASTE MANAGEMENT UNIT ST-341  
CONDENSATE HOLDING TANK AND EVAPORATION POND  
KIRTLAND AIR FORCE BASE  
JUNE 2002**

**SPECIFIC COMMENTS**

- 1 Section 2.2.1.2  
TPH Cleanup  
Criteria  
In February 2002, NMED issued a draft guidance entitled: "*New Mexico Environment Department TPH Screening Guidelines.*" This guidance should now be used instead of the 1993 OCD guidance referenced in this section. Because the primary contaminant at the site is a fuel-water condensate mixture and not a pure fuel product, the screening guidelines presented on Table 2 for waste oil applies where the residential action level is 2,500 mg/kg TPH concentration and the industrial level is 5,000 mg/kg. NMED recommends that the residential action level be applied from ground surface to a depth of 15 feet. Below 15 feet, the industrial action level applies.
  
- 2 Section 2.2.2  
Conceptual Model  
The conceptual model for both site locations should include an analysis of all potential contaminant migration pathways and a land use and exposure profile that fully illustrates the relationship between contaminants, the transport media, and potential receptors. The data collected at the site should support the conceptual site model. Although groundwater is not mentioned here, it is apparent that the assumption has been made that the contamination at the site poses no threat to groundwater. As part of the NFA proposal, this assumption should be supported by contaminant migration estimates or other analysis or data.

Appendix B of the EPA Region 6 Corrective Action Strategy contains a good presentation of how to develop a conceptual site model entitled "*Using the Conceptual Site Model to Select Performance Standards and Develop Data Quality Objectives.*"

A complete conceptual site model must be presented to achieve no-further-action status for site 341.

- 3 2.2.2.3 Data Gaps The intended purpose of the proposed sampling event is to determine the effectiveness of the bioventing program and evaluate whether more remediation is needed before no-further-action status can be granted. However, the sampling program should also include the goal of tagging the bottom of the plume to determine whether or not measurable contamination migration has occurred since plume boundaries were determined during earlier project phases. The current extent of the TPH plume at both site locations should be adequately defined.
- 4 2.2.3.2 Media Characterization The distribution of sample analysis is unclear. It is inferred that in the upper ten feet of each borehole, the three proposed samples would be analyzed for VOCs, SVOCs, PAHs, and TPH. The remaining samples collected below the ten-foot depth will only be analyzed for TPH. The determination that VOC, SVOC, and PAH analysis is not necessary below the 10-foot depth should be justified.
- Also, the proposed total depth of the samples at each location is omitted from this section. It is important that the sampling program adequately characterize the extent of contamination (see comment 3 above).
- 5 2.2.3.2 Media Characterization Plume areas where TPH concentrations were previously measured above 10,000 mg/kg (Figures 2-3 and 2-4) should be adequately characterized during the proposed study. Provide information that confirms that the proposed nine boreholes will provide adequate characterization information about these plume areas.
- 6 3.3 Field Activities Provide information regarding how the proposed investigation will be completed if difficult subsurface conditions are encountered that would render direct push techniques insufficient.