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PETER MAGGIORE
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Certified Mail
Return Receipt Requested

February 25, 1999

Colonel David E. Clary, USAF
Commander
100 S. DL Ingram Blvd., Suite 100
Cannon Air Force Base, NM 88103-5214

Subject: Request for Supplemental Information:
Corrective Measures Study Work Plan
SWMUs 86-90 (Site SD-11)
Cannon Air Force Base

Dear Colonel Clary:

The RCRA Permits Management Program (RPMP) of the New Mexico Environment Department (NMED) has reviewed the above-referenced Workplan, dated August, 1998, and submitted to RPMP on October 20, 1998, as required under the New Mexico Hazardous Waste Management Regulations and Cannon Air Force Base's RCRA Permit.

RPMP has comments on the Workplan which must be addressed in order for us to complete our review. These comments are enclosed as Attachment A. RPMP's comments incorporate those submitted to RPMP by the U.S. Environmental Protection Agency Region 6.

Your response to these comments should be submitted within 60 days of receipt of this letter.

Colonel Clary
February 25, 1999
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If you have any questions please contact Carl Will of my staff at 505-827-1561, ex. 1031.

Sincerely,



Robert S. ("Stu") Dinwiddie, Ph.D., Manager
RCRA Permits Management Program

Attachment

cc: Col. James A. Thomas, III, CAFB
Daniel A. Barnett, CAFB
David Neleigh, EPA Region 6
Carl Will, HRMB

file: HSWA/CAFB/SWMU's 86-90
track: CAFB/Clary/Dinwiddie/2-25-99/SWMU's 86-90 CMS WP RSI

ATTACHMENT

COMMENTS ON CAFB CORRECTIVE MEASURES STUDY WORK PLAN, SWMU'S 86-90

February 25, 1999

General Comments

By letter from Stu Dinwiddie to Colonel Koerner, dated September 19, 1997, HRMB required that a CMS be completed for this site. Address all comments in the letter in the CMS Report when the Report is submitted.

Section One, Introduction

Figure 1-3, Estimated Schedule

According to the schedule submitted with the Workplan, the final Workplan was to be issued on August 20, 1998, and field work was to be completed by October 7, 1998. HRMB did not receive the Workplan until October 20, 1998, which did not allow time for review of the Workplan prior to completion of the field work.

Section Three, Site Background

Include a map showing the location of production well No. 9.

3.3 Previous Investigations

Page 3-3. In the discussion of the 1991 RI, include the levels of TPH detected.

Section Four, CMS Objectives and Approach

4.2 Corrective Measures Study Approach

In the September 19, 1997 letter, HRMB stated that the CMS should address the delineation of horizontal extent of contamination at the site, which had not been done in prior investigations, and determine the means for reducing the levels of TPH contamination to 1000 mg/kg. It is not clear how this Workplan addresses those issues.

The proposed boring locations will not delineate horizontal extent of contamination. TPH was detected at boring 8612, the most westerly boring location at the site, at 5390 mg/kg. Additional borings may be required west of boring location 8612 in order to determine the extent of horizontal contamination, or there must be a risk-based determination that the levels detected are acceptable to remain in place.

There is no discussion in the Workplan of how to address the levels of TPH contamination detected. In order to address whether or not removal of soil contaminated with TPH above 1000 mg/kg is required, the risk assessment process described in the Workplan must incorporate sampling results from prior investigations, including the TPH detected, as well as the results from this current investigation.

Page 4-2. The Workplan states that if concentrations of COPC's are at levels that could migrate to groundwater, based on EPA Region VI Media-Specific Screening Levels (MSSL's), then fate and transport modeling will be done. HRMB is not aware of MSSL's for TPH. Without using MSSLS, how will CAFB determine if TPH levels are a threat to groundwater and if transport modeling is required?

Page 4-2. The Workplan states that once extent of contamination has been defined, then corrective measures alternatives will be evaluated. Remediation goals must be determined before corrective measures alternatives can be evaluated.

4.6.2. Derivation of EPA Region VI MSSLS

MSSLS for direct exposure to soil are not sufficient to be used alone as screening levels. Levels of soil contamination below MSSLS can be unacceptable if there is a threat of transport to groundwater resulting in groundwater contamination above cleanup standards. How will CAFB address this issue for TPH levels at the site?

Page 4-9, line 4. Replace "screening level MSSLS are not expected" with "screening level MSSLS are not exceeded."

The section on MSSLS for lead in soil states that the EPA Region VI industrial soil MSSL for lead is 2,000 mg/kg. As of August, 1998, this value is listed in the EPA Region VI Human Health Medium-Specific Screening Levels as 1,000 mg/kg.

Field Sampling Plan

Page 1-1, paragraph 1, line 2. Change "1-1" to "1-2."

Page 1-1, paragraph 4, line 4. Insert after "collected from" "each of the."

Page 1-2. Specify whether the low or mid-level detection limit is used to trigger USACE Technical Manager notification.

Page 1-2. VOC's will be analyzed by EPA Method 8260B. Be advised of Update III to SW-846 sample collection technique published in the June 13, 1997 Federal Register Vol. 62, No.

114, pp. 32452-463. The accuracy of this method warrants their immediate use versus traditional methods. The three alternatives are: Method 5021, heated head space for volatile concentrations below 200 ppb; Method 5035, heated purge and trap in the range of 5 to 200 ppb; and Method 5035, methanol extract for volatiles exceeding 200 ppb.

Figure 1. What criteria were used to determine the proposed soil boring locations inside the concrete berm? Results of the previous soil boring locations are not discussed, and borings 11A and B1 are not shown. Borings B2, B3, B4, and B5 are shown as completed nine years ago as part of Phase IV IRP. Consider sampling outside of the berm to confirm existing conditions.

Appendix B. EPA Region 6 Human Health Media-Specific Screening Levels. Note that this document (11/7/97) is now out of date. The current document is October 1998 and can be found on the Internet at <http://www.epa.gov/earthlr6/6pd/rcra-c/pd-n/r6scrval.htm>.