

HAZARDOUS WASTE SECTION
MEMORANDUM

TO: Gedi Cibus
Program Support Bureau

FROM: A. Elizabeth Gordon *AGG*
Hazardous Waste Section

RE: Draft Remedial Investigation Report from Cannon Air Force Base
EID File # 397 ER

DATE: July 28, 1988



HSWA
~~*SECRET*~~
Confidential

XIII

Each of these units has been designated as a solid waste management unit (SWMU) and will be regulated according to the Solid and Hazardous Waste Amendments of 1984 (HSWA) during the permitting process. EPA will be the regulatory agent because the State EID is not presently authorized for the HSWA. EPA has contracted with A.T. Kearney to do a preliminary review and visual site inspection and the report was issued in 1987. All of these units were addressed in that report and the information and suggested actions pertaining to them are attached. A summary of the differences between the preliminary review report (PRR) and this draft remedial investigation report (RIR), which postdates the preliminary review report, follows.

The main thrust of the draft remedial investigative thrust is that no further action is warranted at any of the units because site characteristics hinder the migration of organic and inorganic pollutants. These site characteristics are very low annual precipitation; high evapotranspiration; low soil moisture, silty sands with relatively high porosity, high specific retention, alkaline pH and considerable depth to ground water (RIR, p. xiv).

Site 9: Underground Storage Tank Runoff at FPTA-4.

The PR identifies a cluster of four SWMU's in this area and they and the suggested further actions are:

- SWMU 109 Fire Department Training Area No. 4; construct a berm to reduce runoff from the unit.
- SWMU 110 Underground Waste Oil Tank No. 2336; determine the integrity of the unit.
- SWMU 111 Unlined Pit; conduct soil sampling to determine if contamination exists.
- SWMU 112 Oil/Water Separator No. 2336; consider assessing the integrity of the unit.

The RIR indicates that, in 1987, the underground waste oil tank was found to be leaking and, consequently, its use suspended. CAFB has done some sampling to determine the extent of contamination, but, for the reasons given above, thinks no further action is needed. EPA will probably request further sampling and clean up of the area. Although the tank is no longer being used, this area is still in use and should be carefully monitored to be sure that further contamination does not occur. Although soil sampling was conducted in the area of the oil/water separator no. 2336, it is not clear that the area sampled was large

enough to include the unlined pit which overlaps with this separator. More sampling may be required to determine that there are no problems with the unlined pit.

Site 11: Engine Test Cell Overflow Pit and Leach Field.

Again, A.T. Kearney identifies a cluster of units in this area; they and the suggested action are:

- SWMU 86 Engine Test Cell; conduct soil sampling to determine if contamination exists.
- SWMU 87 Former Overflow Pit; conduct further soil sampling.
- SWMU 88 Former Leaching Field--Engine Test Cell; conduct further soil sampling.
- SWMU 89 Evaporation Pond--Engine Test Cell; conduct soil sampling.
- SWMU 90 Oil/Water Separator No. 5114; assess integrity of unit.
- SWMU 91 Recovered Fuel Tank No. 5114; determine the integrity of the unit on a regular basis and provide internal and external protection.

The evaporation pond area was sampled in two locations and found to have low levels of the Antitoxidant 425. EPA will probably require further sampling along with that suggested for the overflow pit and engine test cell. Only two samples have been taken at SWMU 88 and SWMU 89 and that is not enough to determine the full impact of any unit. Also, the evaporation pond is in use and therefore can supply a hydraulic head on the underlying stratum (PR, cover letter). The tank may require an inspection schedule.

Site 12: South Stormwater Collection Point.

- SWMU 85 Storm Water Collection Point; conduct surface water sampling to determine the source of contamination.

CAFB has sampling this area extensively and found barium, mercury and selenium above background levels. EPA may require some level of monitoring primarily because this unit is providing a hydraulic head to the underlying stratum (PR, cover letter) and is also within 800 feet of drinking well no. 6.

Site 20: Northeast Stormwater Collection Point.

- SWMU 95 Northeast Storm Water Drainage Area; conduct soil, surface water and sediment sampling for presence of hazardous constituents.

CAFB did study this area for the first time under this remedial investigation and found a variety of long chain organics and barium and selenium above background levels. Because the unit is still receiving a discharge which can provide a driving force, EPA may require further work at this site.

We do not have copy of this draft report and would appreciate a copy of it or one of the final report for the permit file. Thank you.

cc: Junga Weible, EPA VI