



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

Beruto
Kathy Jones → *Judy*

February 3, 1992

ENTERED

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CERTIFIED MAIL: RETURN RECEIPT REQUESTED

RECEIVED

Colonel David E. Benson, Commander
 27 Combat Support Group
 Cannon Air Force Base, New Mexico 88103

FEB 11 1992

NM ENVIRONMENT DEPARTMENT
 OFFICE OF THE SECRETARY

Dear Colonel Benson:

We have completed a technical review of the Cannon Air Force Base (CAFB) RFI Appendix II workplan dated June 1991 and have determined that the workplan is deficient. A list of deficiencies is enclosed for your review.

You shall have 30 days from the receipt of this letter to submit a modified workplan which addresses the enclosed deficiencies. If this modified workplan is not approved, we may make further modifications as required. The modified workplan then becomes the approved RFI workplan. In addition, the Region recommends that CAFB schedule a meeting so that the details of these deficiencies can be discussed and clarified.

If you have any questions concerning this matter, please contact Richard Mayer of my staff at (214) 655-6775.

Sincerely yours,

WK Honker

William K. Honker, P.E.
 Chief
 RCRA Permits Branch

Enclosure

cc: Judith Espinosa, NMED ✓

DEFICIENCIES ON RFI WORKPLAN FOR CANNON AFB, APPENDIX II SWMU'S

Comment on all Oil/Water Separators: EPA feels that it is not necessary to perform a background soil boring at every oil/water separator (o/ws) site. EPA feels that 4 background soil borings would be sufficient and that Cannon could use background soil data from previous investigations. EPA feels that the remaining background soil borings can be relocated either underneath the units or within the drain fields. In addition, for those oil/water separators that discharge effluent to the storm drainage system, please include a narrative on the path(s) this effluent takes once it leaves the o/ws and a plan view/cross section map showing these paths.

Comment on all heating oil tanks: Since SWMU numbers 2, 4, 6, 10, are actually heating oil tanks (regulated under the New Mexico Underground Storage Tank Program) and not waste oil tanks, Cannon will need to initiate a Class III permit modification, according to requirements of 40 CFR 270.42, to remove those units from Appendix II of the permit.

Comment on tanks that are inactive or do not exist: According to the RFI workplan, SWMU numbers 49, 50, 79, 124, 125, and 126 are tanks that do not exist because they were removed, either before the RFA or after. Please revise the narrative on these SWMU's to include the date each tank was removed and whether the tank is a waste oil tank or a heating oil tank. If the tank has contained only heating oil, then Cannon should initiate a Class III permit modification, as described in the above comment.

SWMU #83; Page A-59: Since there are some background borings being done for the other SWMU's, EPA recommends that the background boring slated for this SWMU be used as an active boring.

SWMU #71; Page A-54: Since this SWMU was a underground tank that collected JP-4 fuel that escaped through pressure relief valves in the piping attached to the bulk storage tanks, this unit is regulated by the New Mexico Underground Storage Tank Program. Cannon should initiate a Class III permit modification, as described in the second comment. However, has Cannon notified EPA of the new oil/water separator which replaced this tank (the newly identified SWMU provision in the HSWA permit)? Please respond in your NOD response.