



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

ENTERED

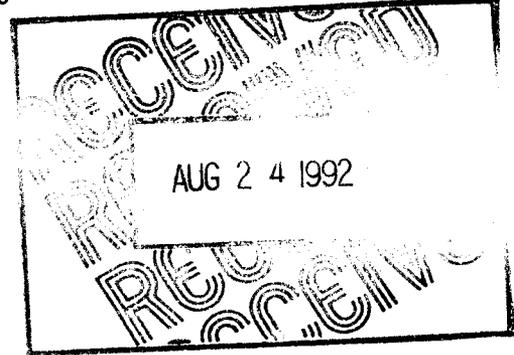
File CAFB
RED
92

EJ/Barlow ✓
Steph/Steve
Stephanie

August 19, 1992

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

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



Dear Colonel Benson:

We have completed a technical review of the Cannon Air Force Base (CAFB) RFI Appendix III workplan dated June 1992 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. If any further clarifications are needed concerning the enclosed comments, the Region recommends that CAFB schedule a meeting.

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

Sincerely yours,

W K Honker

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

~~XXX~~

Enclosure

cc: Benito Garcia, NMED

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

AGE Maintenance Shop Pad, SWMU #31; Page A-2: Cannon needs to indicate the minimum number of soil borings to be taken at this SWMU. In addition, EPA feels that enough soil background data has been taken from past investigations, so that the background soil sample slated for this unit can be used as an "active" boring.

Comment on all Oil/Water Separators: EPA feels that it is not necessary to perform a background soil boring at every oil/water separator site. EPA feels that a sufficient amount of background soil boring data has been taken from past investigations (IRP work, Appendix I and II investigations). EPA feels that these background soil borings can be used as "active" borings. These borings could be located: 1) next to the oil/water separators; 2) within the drain fields; or, 3) between the piping between the separators, sand traps or drain fields.

Oil/Water Separator No. 390, SWMU #72; Page A-29: Since this unit recovered JP-4 fuel from overflow valves in the piping associated with the bulk fuel storage area and never handled waste; Cannon needs to initiate a Class III permit modification, according to the requirements of 40 CFR 270.42, to remove this unit from Appendix III of the permit.

Lead Acid Battery Accumulation Point, SWMU #55; Page A-46: Since numerous background borings have been done from Appendix I and II investigations, EPA feels that the background boring slated for this unit can be converted into an "active" boring.

Civil Engineering Container Storage Area, SWMU #77; Page A-49: Same comment as for SWMU #55. Also, Cannon needs to include the minimum amount of borings proposed around the area.

Recovered Fuel Tank No. 5114, SWMU # 91; Page A-53: Same comment as SWMU #72.

Concrete Rubble Pile, SWMU #97; Page A-54: Same comment as for SWMU #55.

AOC A., Mogas Spill; AOC B., JP-4 Fuel Spill; and AOC C., Blown Capacitors Site: Same comment as SWMU #72.