



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

Steel A.

ENTERED

~~CONFIDENTIAL~~

DEC 17 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

General William M. Guth, Commander
United States Air Force
Headquarters, 27th Fighter Wing (ACC)
Cannon Air Force Base, New Mexico 88103-5214

XIII

Re: Notice of Deficiency, RCRA Facility Investigation (RFI)
Phase I Report for Appendix III SWMUs
Cannon Air Force Base, EPA I.D. NO. NM7572124454

Dear General Guth:

The Environmental Protection Agency (EPA) has completed a technical review of the RCRA Facility Investigation (RFI) Phase I Report for the Appendix III SWMUs dated November 29, 1993. Enclosed is a list of deficiencies for your review.

You shall have thirty (30) days from the receipt of this letter to submit the information requested in the enclosed list of deficiencies.

If you have any questions, please contact Bill Hurlbut of my staff at (214) 655-8305.

Sincerely yours,

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

Enclosure

cc: Benito Garcia, NMED

DEC 27 1993

copy

**LIST OF DEFICIENCIES
CANNON AIR FORCE BASE
EPA ID NO NM7572124454**

1. GENERAL COMMENTS

- a. What is the SOP for integrity testing and visual inspection for all the oil-water separators and sand traps at Cannon Air Force Base? The EPA feels that these oil-water separators and sand traps and associated piping, etc., should be visually inspected and/or integrity tested in Phase II of the RFI Investigation and then tested on an annual basis thereafter.
- b. In September of this year, the EPA sent a letter to Cannon Air Force Base informing them that cleanup levels (ARARs) established under the CERCLA Program were not applicable to the HSWA Corrective Action Program. Throughout this Phase I Report, Cannon AFB has referred to the use of ARARs in relationship to the cleanup of the SWMUs in this RFI Report. EPA will establish cleanup levels as outlined in the Proposed Subpart S Guidance. Since this is a RCRA Facility Investigation Report for SWMUs in the HSWA (Corrective Action) Permit, it is suggested that Cannon AFB not make references to the CERCLA Program in this or any future RCRA Workplans or Reports.
- c. Under each SWMU, a Table was enclosed to show the summary of chemicals reported for the samples collected. Under the heading of the constituents (volatile organics, metals, etc.), there is no mention of the method used. Also, instead of using "reporting levels" it is suggested that you use "detection levels".
- d. The sample logs which were enclosed for our review were very poor and need improvement. The soil descriptions were sketchy at best with large gaps in the description and field screening columns. Several logs did not show if any field screening with an PID or FID had been done or what the values detected were.

2. EXECUTIVE SUMMARY-PAGE ES-9

- a. The word "leach" on the SWMU NO. 129 heading is misspelled as "leech" and should be corrected.

3. AGE MAINTENANCE PAD - SWMU NO. 31

- a. The horizontal extent of the contamination has not been established. Additional borings need to be completed in Phase II of the RFI Investigation.

4. OIL/WATER SEPARATOR (OWS) 196 - SWMU 46

- a. This SWMU will need to be visually inspected and/or tested for integrity in Phase II of the RFI Investigation.
- b. An additional 20 foot boring will need to be completed in the Phase II of the RFI Investigation.

5. OIL/WATER SEPARATOR (OWS) 94 - SWMU 47

- a. Under 8.8, Summary and Recommendations on Page 8-10, the first sentence states that four soil borings were completed at this SWMU. This should be corrected to show that five soil borings were completed.
- b. An additional 20 foot boring will need to be completed in the Phase II of the RFI Investigation.
- c. See comment 4a.

6. OIL/WATER SEPARATOR (OWS) 375 - SWMU 51

- a. Figure No. 9-1 should be updated to show the location of this SWMU.
- b. An additional 20 foot boring will need to be completed in the Phase II of the RFI Investigation.
- c. See comment 4a.

7. OIL/WATER SEPARATOR (OWS) 379 - SWMU 57

- a. Figure 10-1 should be updated to show the location of this SWMU.
- b. An additional 20 foot boring will need to be completed in the Phase II of the RFI Investigation.
- c. See comment 4a.

8. SAND TRAP NOS. 5077A AND 5077B AND OIL/WATER SEPARATOR NO. 5077C -SWMU NOS. 61, 62, AND 63

- a. An additional 20 foot boring will need to be completed at each SWMU in the Phase II of the RFI Investigation.
- b. See comment 4a.

9. OIL/WATER SEPARATOR (OWS) 326 - SWMU NO. 70

- a. Field screening results for borings 7001, 7002, and 7004 were incomplete on the boring logs. Please update these.
- b. The vertical and horizontal extent of contamination has not been defined and further borings will be required in Phase II of the RFI Investigation.
- c. Since this SWMU is now inactive, the EPA agrees that it and all associated piping, etc., be removed.
- d. See comment 4a.

10. OIL/WATER SEPARATOR NO. 5129 - SWMU NO. 92

- a. Since the separator and the leach well are abandoned, has Cannon AFB considered removal? To remove any possible source of contamination, the EPA suggests that this SWMU and all associated piping, etc., be removed in the future.
- b. See comment 4a.

11. OIL/WATER SEPARATOR NO. 5121 - SWMU NO. 93

- a. Table 14-2b shows Cadmium contamination at 107,000 ppm but Table 14-4 does not show this as a maximum detected concentration. Which Table is correct and please revise.
- b. Was all associated piping, etc., removed also?
- c. See comment 4a.

12. OIL/WATER SEPARATOR NO. 5144 - SWMU NO. 94

- a. Since this SWMU is abandoned, has Cannon AFB considered removing it? To remove any possible source of contamination, the EPA suggests that this SWMU and associated piping, etc., be removed in the future.
- b. The complete boring log for the #1 boring is not included. Please update and include the boring log.
- c. An additional 20 foot boring will be required at the OWS and the sand traps.
- d. See comment 4a.

13. SAND TRAP AND LEACH FIELDS AT THE PETROLEUM, OIL AND LUBRICANTS (POL) WASH RACK - SWMU NO. 127

- a. To remove any possible source of contamination, the EPA suggests that the old leach field be removed in the future.
- b. See comment 4a for this sand trap.

14. LEAD-ACID BATTERY ACCUMULATION POINT - SWMU NO. 55

- a. According to Figure 17-1, soil borings were not taken directly under the pad on which the accumulation point was located. Additional borings are required in the Phase II of the RFI.

15. CIVIL ENGINEERING CONTAINER STORAGE AREA - SWMU 77

- a. Field screening results were incomplete for #1, #2, #5, and #6 on the boring logs. Please update these.
- b. According to Figure 18-1, it appears that the entire area inside the fence is concrete. If this is correct, then the dimensions that Cannon AFB states in the text for this SWMU and the dimensions in Figure 18-1, don't coincide. This map will need to be updated.
- c. To determine the horizontal extent of contamination, additional borings will be required on the sides of the storage area.

16. PLAYA LAKE - SWMU NO. 103

- a. The vertical and horizontal extent of contamination has not been defined and additional borings will be required in the Phase II of the RFI Investigation at this SWMU.