



DEPARTMENT OF THE AIR FORCE

HEADQUARTERS 27th FIGHTER WING (ACC)
CANNON AIR FORCE BASE, NEW MEXICO

2 FEB 1994

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Cannon AFB NM 88103-5214

Mr. William K. Honker
U.S. EPA Region VI
Chief, RCRA Permits Branch
1445 Ross Avenue Suite 1200
Dallas Tx 75202-2733

Dear Mr. Honker

Attached is the response to your letter dated 20 Dec 93 concerning the Notice of Deficiency (NOD) issued with respect to the Phase I, Appendix II RCRA Facility Investigation (RFI) Report. As requested by Bill Hurlbut of your office, a specific response is provided to each NOD question.

You will notice in the draft RFI Report that Eureka Labs was used as an independent Quality Assurance Laboratory. We have recently been informed that Eureka Labs has been banned from use by the EPA. We would like to note that only 37 samples out of 602 samples taken for Appendix II, Phase I, were sent to Eureka Labs, amounting to 6.15% of the samples taken. We therefore feel that the integrity of the data used for this report has not been compromised by the use of Eureka labs and hope you agree.

The point of contact for this issue at Cannon AFB is Mr. John Ekhoft at (505) 784-2739.

Sincerely

DAVID A. MITCHELL, Colonel, USAF
Commander

Attachment
NOD Response

cc:
Dave Morgan, NMED
Steve Patten, NMED

RESPONSE TO NOTICE OF DEFICIENCIES
DRAFT RFI REPORT
CANNON AFB APPENDIX II - PHASE I
February 2, 1994

1. GENERAL COMMENTS

a. What is the SOP for integrity testing and visual inspection for all the oil-water separators at Cannon Air Force Base?

RESPONSE: An oil-water separator management plan is being planned. This management plan will include recommendations on what separators are operable and which ones should be removed. The removal process would consist of visually inspecting the separator prior to removal and then testing the bottom of the excavations for the appropriate contaminants. If no significant levels of contaminants were found at the bottom of an excavation, the RFI investigation for that SWMU should be closed. If significant levels are found, an additional boring would be scheduled for that site to determine the vertical extent. Also a new service contract is being brought on line to service the oil-water separators and testing of contents. The cleaning, inspecting, and testing of the oil-water separators will now be done on a routine basis. The inspections will be done on a quarterly basis by the facility managers.

b. The maps which you enclosed with each SWMU were hard to read and they did not show the location of the SWMU. In most of the cases, only the soil boring locations were shown but the quality of the maps were so poor, it was hard to see these. These maps need to be updated with a scale and legend and showing the boring locations in relation to the SWMU location.

RESPONSE: Maps have been updated by LRL Sciences. The new format included the northings and eastings of boreholes, depth of borehole, scale, and legend. The new maps will be included in the corrected reports.

c. Appendix A - the Validated Data Tables showed the chemicals that were analyzed for but did not indicate the methods or the detection limits for these methods. These need to be updated and revised.

RESPONSE: The analytical methods were presented in Volume I of the RFI Report. A key will also be placed in Volume V, Appendix A - Validated data. EPA has requested Method Detection Limits (IDL) be listed in Appendix A; this task is being completed by LRL.

d. The sample logs which were enclosed for our review were very poor and need improvement. The sample log form was lacking in its format and a different form should be used. The soil descriptions were sketchy at best and there was no indication if field screening with an FID or PID was done. Also, there was not a field screening column in the sample log form to indicate "hot spots" if they were encountered. An improved sample log form will be used in the Phase II investigation.

RESPONSE: The existing boring logs were prepared within the scope of the EPA approved Work Plan. Boring logs for future projects will be prepared in accordance with guidelines set by CAFB and EPA.

e. The narrative for each SWMU lacked detail. What is the depth of each of the SWMUs below ground surface?

RESPONSE: An estimated depth below ground surface for the top and bottom of the SWMU will be included in the narrative. All other available information has been included in the narrative.

f. All the samples in this Phase I RFI Investigation should have been analyzed for both VOCs, SVOCs, and TPH to depth. The additional borings required in Phase II will be analyzed for these parameters in addition to BTEX and metals. Also, field screening will be done with an FID or PID to depth with this information noted on the boring logs.

RESPONSE: EPA approved Work Plan was followed. The need for an additional boring at these sites will be determined in a future Phase II definition.

2. OIL-WATER SEPARATOR (SWMU NO. 1/SITE NO. 119)

a. This SWMU and the associated piping, etc., will need to be visually inspected and/or tested for integrity in Phase II of the RFI Investigation.

RESPONSE: Please refer to response to General Comment 1a.

b. The vertical extent may not have been defined. Therefore, additional deeper borings will need to be completed in the Phase II RFI Investigation.

RESPONSES: The need for additional borings at this site will be determined in a future Phase II definition and by integrity test and visual inspection of the oil-water separator. However, we believe we already have enough information to recommend No Further Action at this SWMU.

3. OIL-WATER SEPARATOR (SWMU NO. 3/SITE NO. 108)

a. See comment 2b.

RESPONSE: The OWS is gone and therefore cannot be tested or inspected. The need for additional borings at this site will be determined by a future Phase II definition. However, we believe we already have enough information to recommend No Further Action at this SWMU.

4. OIL-WATER SEPARATOR (SWMU NO. 5/SITE NO. 121)

a. Is this unit still active?

RESPONSE: This unit formerly located on the west side of facility 121 no longer exists. It was removed during the demolition of facility 121. Facility 121 was an old WWII era hangar which was demolished and replaced by a new Small Aircraft Maintenance dock, which is facility 126. Thus, there is no

OWS in the area of the investigation on the west side of building 126. There is a new OWS on the east side of facility 126. The existence of this new OWS has caused some confusion over what OWS was studied by LRL sciences. LRL sciences actually studied the old location on the west side of the facility as they were required, but apparently wrote a site description based on information about the new OWS on the east side of the facility. The SWMU description on page 54 of Volume I is wrong and needs to be rewritten. Paragraphs 4.1.1 Setting and 4.1.2 History of Use will be corrected. We believe the confusion comes from a report written by the Tulsa district of the Army Corps of Engineers concerning the testing of the new OWS on the east side of the building.

b. See comments 2a and 2b.

RESPONSE: The OWS is gone and therefore cannot be tested or inspected. The need for additional borings at this site will be determined by a future Phase II definition. However, we believe we already have enough information to recommend No Further Action at this SWMU.

5. OIL-WATER SEPARATOR (SWMU NO. 7/SITE NO. 129)

a. In Borehole No. 2 (5.4.3.2), were any metals detected at depth.

RESPONSE: This comment is being addressed by LRL.

b. See comments 2a and 2b.

RESPONSE: This SWMU has been missidentified as an OWS. At sometime in the past at Cannon AFB, every concrete box connected to sewer systems that could be pumped out was described as an oil-water separator. Most of these units were OWSs, but some are actually single compartment grease traps or sand traps. We believe this unit to be a single compartment grease trap. I believe the actual size and purpose of this unit will only be determined when it is removed. We believe it is a grease trap because it is described as a grease trap on a site plan of the 50 year old facility drawings. These drawings do not show construction details of this unit. Therefore, the SWMU description given in the original report is wrong and will be corrected in the final RFI report. The only opening to this unit is a six inch diameter cover plate, therefore it is going to be extremely difficult to inspect it. Although the SWMU description is wrong, the correct location was studied. The need for additional borings at this site will be determined by a future Phase II definition. However, even with the incorrect SWMU description, we believe we already have enough information to recommend No Further Action at this SWMU.

6. OIL-WATER SEPARATOR (SWMU NO. 8/SITE NO. 165)

a. See comments 2a and 2b.

RESPONSE: In regards to comment 2a please refer to General Comment 1a. The need for additional borings at this site will be determined by a future Phase II definition. However, we believe we already have enough information to recommend No Further Action at this SWMU.

7. AIRCRAFT WASHRACK DRAIN SYSTEM (SWMU NO. 9/SITE NO. 165)

a. Under BTEX (7.4.2) and Metals (7.4.3), you state that the samples were analyzed only to 10 feet, but yet the borings were 20 foot deep. Please explain.

RESPONSE: This comment is being addressed and the corrections to the final report will be accomplished by LRL sciences.

b. See comments 2a and 2b.

RESPONSE: In regards to comment 2a, please refer to General Comment 1a. The need for additional borings at this site will be determined by a future Phase II definition. However, we believe we already have enough information to recommend No Further Action at this SWMU.

8. OIL-WATER SEPARATOR (SWMU NO. 11/SITE NO. 170)

a. Is this SWMU abandoned?

RESPONSE: The unit at SWMU 11, building 170 is still active. This SWMU/unit appears to be identical to SWMU No. 7 at Facility 129, therefore our response for comment for 5 b. applies here also.

b. The summary states that mercury and methylene chloride was present at the 10 foot interval. What borings and at what amount were they detected? The tables state that these were either undetected or estimated values.

RESPONSE: This comment is being addressed and the corrections to the final report will be accomplished by LRL sciences.

c. See comments 1a, 2a, and 2b.

RESPONSE: In regards to comments 1a and 2a, please refer to General Comment 1a. Inspection of this unit will be difficult because the only opening to this unit is a small six inch diameter lid. The need for additional borings at this site will be determined by a future Phase II definition. However, even with the incorrect SWMU description, we believe we already have enough information to recommend No Further Action at this SWMU.

9. OIL-WATER SEPARATOR (SWMU NO. 16/SITE NO. 680)

a. Was the 140-gallon holding tank removed with this SWMU?

RESPONSE: Yes, everything associated with SWMU No. 16 has been removed. A new building addition with a concrete floor now covers this SWMU site.

b. Paragraph 9.2.1 should be corrected.

RESPONSE: This comment is being addressed, and the corrections to the final report will be accomplished by LRL sciences.

c. See comment 2b.

RESPONSE: The need for additional borings at this site will be determined by a future Phase II definition. However, we believe we already have enough information to recommend No Further Action at this SWMU.

10. OIL-WATER SEPARATOR (SWMU NO. 32A/SITE NO. 186, #1-EAST)

a. See comments 2a and 2b.

RESPONSE: In regards to comment 2a, please refer to General Comment 1a. The need for additional borings at this site will be determined by a future Phase II definition. However, we believe we already have enough information to recommend No Further Action at this SWMU.

11. OIL-WATER SEPARATOR (SWMU NO. 33B/SITE NO. 186, #2-WEST)

a. See comments 2a and 2b.

RESPONSE: In regards to comment 2a, please refer to General Comment 1a. The need for additional borings at this site will be determined by a future Phase II definition. However, we believe we already have enough information to recommend No Further Action at this SWMU.

12. OIL-WATER SEPARATOR (SWMU NO. 38/SITE NO. 194)

a. See comments 2a and 2b.

RESPONSE: In regards to comment 2a, please refer to General Comment 1a. The need for additional borings at this site will be determined by a future Phase II definition. However, we believe we already have enough information to recommend No Further Action at this SWMU.

13. OIL-WATER SEPARATOR (SWMU NO. 39/SITE NO. 195)

a. See comments 2a and 2b.

RESPONSE: In regards to comment 2a, please refer to General Comment 1a. The need for additional borings at this site will be determined by a future Phase II definition. However, we believe we already have enough information to recommend No Further Action at this SWMU.

14. ABOVEGROUND & UNDERGROUND STORAGE TANKS (SWMU NO. 48A & B/SITE UST)

- a. Was all the associated piping, etc., removed with this tank?

RESPONSE: Everything associated with SWMUs 48 A&B has been removed. A new asphalt parking lot now covers this SWMU site.

- b. See comment 2b for SWMU 48A.

RESPONSE: The need for additional borings at this site will be determined by a future Phase II definition. However, we believe we already have enough information to recommend No Further Action at this SWMU.

15. SUMP (SWMU NO. 83/SITE SUMP)

- a. See comments 2b.

RESPONSE: The need for additional borings at this site will be determined by a future Phase II definition. However, we believe we already have enough information to recommend No Further Action at this SWMU.

16. EXPLOSIVE ORDNANCE DISPOSAL TRAINING AREA (SWMU NO. 108/EOD)

- a. See comments 2b.

RESPONSE: We believe the threat to the environment has been overestimated at this SWMU because of the site name "Explosive Ordnance Disposal Training Area". This area is only used to train military personnel in the safe use of the large "firecrackers" and smoke bombs used during military exercises. It is NOT used for disposal of any explosive ordnance. In order to end some of the concern the "History of Use" will be rewritten in the final RFI report. The need for additional borings at this site will be determined by a future Phase II definition. However, we believe we already have enough information to recommend No Further Action at this SWMU.