



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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DALLAS, TX 75202-2733

Barbara

Y. G. H. P. B.

FV99

DOC 207 1994



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

Dear General Guth:

The Environmental Protection Agency (EPA) has completed the technical review of the RFI Phase II Workplan for the Appendix II and III SWMUs dated July 13, 1994. Enclosed is a list of deficiencies for your review.

You shall have 60 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. Effective August 1, 1994, Mr. Hurlbut can be reached at (214) 665-8305.

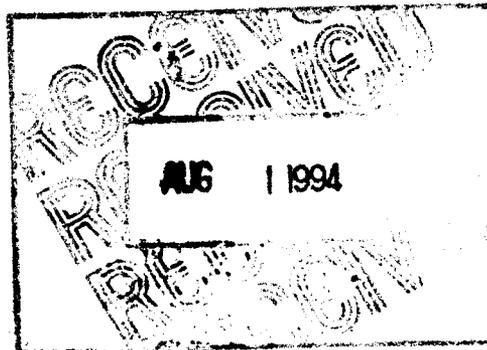
Sincerely yours,

W.K. Honker

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

Enclosure

cc: Benito Garcia, NMED



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

GENERAL COMMENTS

- a. EPA suggests that figures that apply to each SWMU should be included in the section that relates to the SWMU.
- b. Indicate on each figure, the location of the SWMU.
- c. Why is there a difference in the depth of the Ph. II borings that will be completed at SWMUs of equal depth?
- d. A visual inspection of these SWMUs was to be done in the Ph. II Investigation but the workplan does not mention these inspections. These inspections will be required during the Ph. II Investigation.
- e. Cannon AFB mentions in the Ph. II Workplan, that some analysis was less than the background concentrations. What is Cannon AFB using for background numbers?
- f. In the Ph. II Workplan, Cannon AFB states that soil samples will be analyzed for VOCs, SVOCs, TAL Metals, etc. Please include a table which shows what constituents will actually be analyzed for.

SWMU NO. 3 - OIL/WATER SEPARATOR

- a. The is SWMU needs to be included in the Ph. II Investigation.

SWMU NO. 5 - OIL/WATER SEPARATOR

- a. Since no borings have been taken SE of the unit, EPA suggests that this additional boring be placed here.

SWMU NO. 7 - OIL/WATER SEPARATOR

- a. This appears to be the same type oil/water separator as in SWMU #1 which is 10 feet deep. The additional borings need to be completed to 25 feet.

SWMU NO. 8 - OIL/WATER SEPARATOR

- a. EPA suggests that two of the new locations be placed to NE and the SW of the SWMU.

SWMU NO. 11 - OIL/WATER SEPARATOR

- a. EPA suggests that one of the additional borings be placed on the SE side of the SWMU.

SWMU NO. 16 - OIL/WATER SEPARATOR

- a. This SWMU needs to be included in the Ph. II Investigation.

SWMU NO. 32A - OIL/WATER SEPARATOR

- a. This SWMU needs to be included in the Ph. II Investigation.

SWMU NO. 38 - OIL/WATER SEPARATOR

- a. EPA suggests that one of the additional borings be placed on the NW side of the SWMU.

SWMU NO. 39 - OIL/WATER SEPARATOR

- a. The location of the SWMU on Figure 2-10 was not evident. This figure needs to be revised.
- b. The additional borings should be moved closer to the SWMU or drilled deeper.

SWMU NO. 48A - UNDERGROUND STORAGE TANK

- a. The additional borings need to be sampled every 5 feet for VOCs, SVOCs, BTEX, and metals to depth.

SWMU NO. 48B - ABOVEGROUND STORAGE TANK

- a. An additional boring needs to be completed at this SWMU since during the last investigation, the thirty foot samples were analyzed only to 5 feet for VOCs.

SWMU NO. 83 - SUMP

- a. Due to contamination on the surface, it is suggested that the three new borings be placed at new locations around the SWMU so that the horizontal extent might also be defined.

SWMU NO. 108 - EXPLOSIVE ORDNANCE DISPOSAL TRAINING AREA

- a. The analysis of the soil samples should also include SVOCs.
- b. EPA suggests that these five new sampling locations be moved away from the old existing soil borings.
- c. The approximate outline of the EOD Area on Figure 2-13 is recommended for ease of document review.
- d. Figure 2-13 should be revised to show the correct boring locations.

SWMU NO. 31, 47, 61, 62, 70, 92, 93, 127, 55, 77, AND 103A

- a. In your response dated January 26, 1994, to the EPA's NOD, Cannon AFB stated that the additional borings needed at these SWMUs would be determined in the Phase II Workplan, but there is no mention of these in the workplan.
- b. The additional borings at SWMU #55 should include analyses of samples for VOCs, SVOCs, and metals. Please include this information in the revised workplan.

SWMU NO. 51 - OIL/WATER SEPARATOR

- a. It is suggested that these additional borings be moved to SW and NE sides of this SWMU.

SWMU NO. 70 - OIL/WATER SEPARATOR

- a. As stated above, this SWMU will be included in the Ph. II Investigation since there is evidence of a large release at it. EPA informed Cannon AFB that the pilot bioventing study was not related to the RFI Investigations and that the extent, both horizontally and vertically, must be defined.

SWMU NO. 94 - OIL/WATER SEPARATOR

- a. Does Cannon AFB plan to complete a well at the other sand trap? Another boring at this SWMU will be required since the depth of this sand trap is not known.

SWMU NO. 97 - LANDFILL NO. 25

- a. Where is the screen set and how long is the screen in this monitoring well?