



## ATTACHMENT

The following comments and modifications are provided concerning the Cannon Air Force Base Draft RCRA Facility Investigation (RFI) Phase I Work Plan for Landfill #5 Solid Waste Management Unit #113. This review was performed by the New Mexico Environment Department's Hazardous & Radioactive Materials Bureau. The first category includes general comments which are not specifically described in the RFI work plan but which are important in the continuing corrective action process. The second category describes specific modifications which must be incorporated into the text of the final approved RFI Phase I work plan.

### GENERAL COMMENTS:

The two most significant items which are not specifically addressed in the RFI work plan are:

- 1 During the May 19, 1994 meeting between CAFB and NMED, CAFB presented a facility-wide report on background metals entitled "Concentrations of Selected Naturally Occurring Chemical Constituents in Soil and Groundwater at Cannon Air Force Base, Clovis, New Mexico." CAFB proposed that this document be reviewed in support of background metals concentrations at SWMU #113. No determination of soil background metals concentrations have been specifically approved for this RFI Work Plan.
- 2 Regardless of what is determined during the Phase I or Phase II investigations, the necessity for ground water and/or vadose zone monitoring remains as a possibility.

### SPECIFIC MODIFICATIONS:

The following specific modifications must be incorporated into the text of the final approved RFI Phase I work plan. Items are listed by volume, section number, paragraph, and page. When applicable, the relevant text is quoted for clarification. Following the item, specific modifications are placed in quotations. Other modifications are described and the facility must determine the text changes which address these modifications.

NUMBER	ITEM
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| 1 | Vol. 1, section Preface, 1st paragraph, page 3. <b>"Data generated from the geophysical survey and soil gas survey will be used to aid the locating of 30 soil borings to be drilled and sampled to document the presence or absence of contaminated leachate in the native soil beneath the landfill burial cell."</b> |
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Modification: The term "contaminated leachate" must be

replaced by hazardous constituents.

- 2 Vol. 1, section 1, second bullet, page 1-2. **"Evaluate the data collected to identify potential migration pathways for future evaluation of human health and environmental risks (if required) associated with chemicals found in soils beneath Landfill No. 5."**

Modification: The term "soils" must be replaced by environmental media.

- 3 Vol. 1, section 3, figure 3-2. **Preliminary Exposure Pathway Flow Chart Landfill No.5 "Existing analytical data indicates no evidence of groundwater contamination due to past activities at Landfill No. 5."**

Modification: Because the ground-water monitoring system at Landfill No. 5 is not designed to monitor the entire landfill but specifically for Cell 3, it is unknown whether ground water contamination exists. The text must be modified to reflect the unknown impact because of lack of an adequate ground-water monitoring system.

- 4 Vol. 1, section 3, figure 3-2. **Preliminary Exposure Pathway Flow Chart Landfill No.5 "Potential Receptors"**

Modifications: Mechanisms must be in place to reevaluate land use and risk in the future or a residential land use must be used with the most conservative assumptions.

- 5 Vol. 1, section 4.3.3 1st paragraph, page 4-5. **"The subsurface soil samples collected will also be used to characterize the vertical distribution of contamination, so that the potential impact to groundwater can be addressed."**

Modification: The term "groundwater" must be replaced by environmental media.

- 6 Vol. 1, section 4.5.3, 2nd paragraph, page 4-12. **"The proposed RCRA Subpart S action levels, also presented in Tables 4-3 and 4-4, if exceeded, would also trigger a CMS."**

Modification: The RCRA Subpart S action levels are only examples. These action levels must be calculated using the most recent toxicological data from the Integrated Risk Information System (IRIS). If no IRIS

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data for a particular hazardous constituent is found, then the Health Effects Assessment Summary Tables (HEAST) should be utilized. If no HEAST data is available, then CAFB should contact the EPA Environmental Criteria and Assessment Office (ECAO) for toxicological data. Sources of this toxicological data should be referenced along with the date of the reference for each hazardous constituent analyzed for at the landfill. Tables 4-3 and 4-4 must be revised to reflect these parameters. The Subpart S action levels are calculated for single constituents. A guideline approach for concentrations of multiple constituents which occur below action levels but within an order of magnitude of the action levels, is that each constituent should be mathematically normalized to determine if aggregate risk exceeds 1.