



DEPARTMENT OF THE AIR FORCE

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

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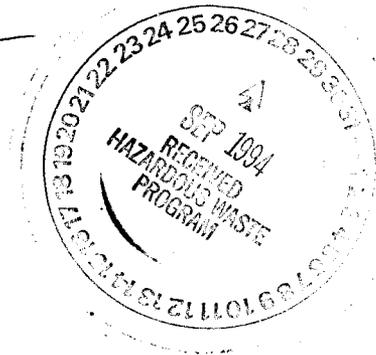
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Christopher S. Long, Colonel, USAF
Commander, 27th Support Group
100 S DL Ingram Blvd Suite 200
Cannon AFB NM 88103-5217

23 SEP 1994

~~CONFIDENTIAL~~

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



XIII

Dear Mr. Honker

Attachment 1 is our response to your 23 Aug 94 letter concerning the Notice of Deficiency (NOD) issued with respect to the Appendix I RFI Phase II Report. In accordance with specific guidance obtained in an earlier telephone conversation with Mr. Bill Hurlbut of your staff, our response directly replies to the questions listed in the NOD.

With your consideration, we request the attached status of Appendix I Solid Waste Management Units and our RFI Report of Phase II to Appendix I of Sep 94 become the approved RFI Report.

If you have any questions, please contact Mr. Sandi K. Mukherjee, P.E. at (505) 784-4639.

Sincerely

Christopher S. Long
CHRISTOPHER S. LONG, Colonel, USAF
Commander, 27th Support Group

Attachment:
Response to NOD

STATUS OF APPENDIX I
SOLID WASTE MANAGEMENT UNITS (SWMUs)

CANNON AIR FORCE BASE, NEW MEXICO

19 SEPTEMBER 1994

The status of the following Appendix I SWMU's is being provided in response to a Notice of Deficiency (NOD) from USEPA, Region VI.

SWMUs #34, 76, 78, 81, 98, 106, and 107: These SWMUs will have administrative controls, as discussed in the Phase II RCRA Facility Investigation (RFI) Work Plan for Appendix I, dated April 9, 1993 (Work Plan). Boundary corners have been established at the corners of each of these SWMUs and have been surveyed into the boundary system of the Base. This work was performed by a Professional land Surveyor registered in New Mexico. These brass benchmarks, set into the ground, have been placed on the boundary corners, with the SWMU number stamped onto the monument. Three numbered original Plats have been prepared, and will be filed with the Base, EPA Region VI, and the local zoning authority, or authority with jurisdiction over local land use. USEPA will receive their Plats within 2 weeks.

SWMUs #86-90: These SWMUs makeup the Oil/Water Separators commonly referred to as SD-11. These Oil/Water Separators and Underground Storage Tank (UST) was removed in July-August 1994. As contamination was encountered, and was not completely excavated, additional RFI investigations to determine nature and extent of contamination at these SWMUs are being planned for FY 95.

SWMU #95: This is the Northeast Storm Drainage Area (Outfall 001), a 42 inch CMP that discharges to the east of the runways, and collects drainage from a watershed with varied industrial activities, including fuel storage, maintenance, and flight line operations. The Northeast Storm Drainage Area is included as part of the Base-wide Stormwater and National Pollution Discharge Elimination System (NPDES) Permit. This Permit requires the Base to determine if sampling is needed in accordance with USEPA Manual PB92-235969, Annex J.

SWMU #96: This SWMU is commonly referred to as the Old Entomology Rinse Area. The Draft Phase II RFI Report (July 1994) has been submitted to USEPA Region VI, and the Final Report will be submitted to USEPA by 29 September 1994.

SWMUs #101 and 102: Wells 101 E, 101 F, 101 G, and 101 H, at the sewage lagoons, will be monitored (sampled) on an annual basis. Results of the annual monitoring events will be submitted to USEPA Regions VI within 90 calendar days following the sampling. The samples will be analyzed for VOC's, Pesticides/PCBs, Metals, Nitrates, Sulfates, and Total Dissolved Solids (TDS). The analytical methods that will be used can be found in the Work Plan.

SWMU # 109: This is the Fire Training Area #4. As the new fire training area has not yet been completed, no further investigations have been performed at this site. Upon activation of the new fire training area, the current site will be deactivated. Once deactivated, investigations will be performed at SWMU #109. At this time, the investigation is expected to include: four borings to 100' around the mock airplane to evaluate lateral and vertical extent of TPH in the underlying soils, two borings to 75' at the "tree" area to evaluate lateral and

vertical extent of TPH in underlying soils, two borings to 75' at the "vehicle burn" area to evaluate lateral and vertical extent of TPH in underlying soils, and three borings to 100' spaced toward the outer perimeter of the Area to confirm any spread of petroleum products from past activities. The oil/water separator and leach field will also be investigated to evaluate lateral and vertical extent of TPH in underlying soils. The exact location of these borings will be based upon site inspection and the findings of the other borings. The samples will be analyzed for VOCs, Semi-volatiles, TPH, and Metals (Lead and Chromium). The analytical methods and additional information can be found in the Work Plan.