



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
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*Con 11 & of
Steve P...
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file ✓
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~~CONFIDENTIAL~~

JAN 27 1995

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ENTERED

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

XIII

General Guth:

The Environmental Protection Agency (EPA) has completed a technical review of the RCRA Facility Investigation (RFI) Phase III Workplan for the Appendix I SWMUs dated January 23, 1995. 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 Mr. Bill Hurlbut of my staff at (214) 665-8305.

Sincerely yours,

W.K. Honker

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

Enclosure

cc: Benito Garcia
New Mexico Environment Department ✓

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JAN 30 1995



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

- 1. GENERAL COMMENTS - PHASE III RCRA INVESTIGATION FOR APPENDIX II SWMUS**
 - a. Please include in this workplan, a blank copy of the boring logs which will be used in this investigation.
 - b. This workplan does not include a community relations plan which is required.

- 2. SECTION 1.0 - INTRODUCTION - PAGE 1-1**
 - a. This document should be re-title Phase III RCRA Facility Investigation for the Appendix I SWMUs (86 thru 90).
 - b. On this page, this document states that this is a Phase II RCRA Facility Investigation. Page 1-1 should state that this is a Phase III RCRA Facility Investigation for the Appendix I SWMUs.

- 3. SECTION 1.0 - TABLE 1-1**
 - a. This table should be corrected to show that SWMU No. 87 is the former overflow pit, SWMU No. 88 is the former leaching field, SWMU No. 89 is the former evaporation pond, and that SWMU No. 90 was the 2 oil/water separators and the UST.

- 4. SECTION 2.2.1 - DESCRIPTION OF SITE SD-11 - PAGE 2-3**
 - a. The report references figure 2-2 and references boring 11A in this figure. Yet figure 2-2 does not show boring 11A. This should be corrected in the final workplan.

- 5. SECTION 2.2.2 - PREVIOUS INVESTIGATIONS - PAGE 2-5**
 - a. Please explain the second paragraph on page 2-5. This paragraph also references figure 2-5. This figure was not included in the workplan.
 - b. The previous investigations discussion should be expanded. It is far too general in scope.

- 6. SECTION 4.1 - PURPOSE AND SCOPE - PAGE 4-1**
 - a. In this workplan, Cannon states that the work planned in this document will apply only to SWMUs 87 and 90. This workplan should apply to SWMUs 86 thru 90. This will need to be corrected in the final workplan.

- b. This workplan uses the IRP designation Site "SD-11" to discuss the SWMUs in this workplan. Site SD-11 includes SWMUs 86 thru 90. When discussing the separate SWMUs within Site SD-11, please use the SWMU number instead of the IRP designation.

7. SECTION 4.3.2 - SAMPLE LOCATIONS, FREQUENCIES, AND ANALYSIS

- a. Samples taken every 5 feet will be screened in the field with a PID or Fid and a sample will be taken from any "hot spots" encountered. Samples within 5 foot sections will not be composited. This will need to be stated in the final workplan.
- b. Since this workplan will determine the extent of the contamination at the excavation, shouldn't more borings be done so as to determine the vertical and horizontal extent of contamination? No borings are planned east of the excavation and only one on the north, south, and west sides. Cannon AFB has told the EPA that after these borings are completed, that a complete removal of the contamination will be done. Have these plans been changed?
- c. A discussion of the hydrogeology at Cannon Air Force Base is required which will discuss the groundwater as well as the groundwater gradient at the base. Why is a sample of the water from water well 9 being taken for analysis when this well is north of the SWMU? EPA understood that the gradient at Cannon AFB was to the southeast.

**8. SECTION 4.3.5 - SAMPLE HANDLING, DECONTAMINATION, AND ANALYSIS
- PAGE 4-8**

- a. Table 4-1 lists method "8242" for the VOCs analysis and this should be corrected in the final workplan.
- b. This Table should be re-titled SWMU 90 instead of the Site SD-11 designation.