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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733**

*ENBATA f/h
Steve T.*

JAN 30 1995

**27th Fighter Wing Commander
100 South D.L. Ingram Blvd.
Suite 100
Cannon Air Force Base, NM 88103-5214**

Dear Commander:

The U.S. Environmental Protection Agency (EPA) has determined that the information currently available to assess the disposition of Cannon Air Force Base (AFB) under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) is insufficient, inadequate, or does not meet specific standards as identified in appropriate guidance. The last information available to the EPA on Cannon (AFB) is a RCRA Facility Assessment report dated 1987.

Unfortunately, the guidance documents for performing Preliminary Assessments (PAs) and Site Inspections (SIs) under CERCLA were not available until September 1992. Therefore, although your facility may be listed in CERCLIS as having a completed PA/SI on file, this does not mean that the PAs or SIs received followed the current guidance.

For this reason, most facilities prior to this time submitted reports that did not address all the current Hazard Ranking System (HRS) requirements for ranking sites to the Superfund National Priorities List (NPL). At the time of receiving the information, EPA policy was to attempt to evaluate the facility based on the current information available. Consequently, upon publication of the HRS Final Rule in December 14, 1990, Federal Register Vol. 55 No. 241, it was determined that reports submitted prior to the Rule were grossly inadequate for scoring purposes.



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In accordance with CERCLA Section 120(d), EPA must take steps to ensure that information necessary to assess the threat to human health and the environment is provided. Furthermore, Executive Order 12580 delegates the responsibility for the preparation of this information to the Federal Agencies. Facilities have twelve months to provide this information to EPA.

The EPA has determined that a Site Inspection (SI) following the current guidance for Cannon AFB would provide the required information to assess the disposition of the site in reference to CERCLA. The SIs must be performed and reported as described in the September 1992 OSWER Directive 9345.1-05, Guidance for Performing Site Inspections Under CERCLA. I am enclosing a copy of this information for your staff's use.

Please take the appropriate actions necessary to provide the requested information to the EPA and to fulfill your agency's obligation under CERCLA. We look forward to working with you.

If you have any questions, please have your staff contact Mr. Lon Biasco at (214) 665-6673.

Sincerely yours,

Eddie A. Sierra
for Carlene Chambers, Acting Chief
Superfund Management Branch

Enclosure

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