



DEPARTMENT OF THE AIR FORCE

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

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23 FEB 1995

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~~CONFIDENTIAL~~



Mr. William Honker  
US Environmental Protection Agency Region VI  
1445 Ross Avenue Suite 1200  
Dallas TX 75202-2733

*VI*

Dear Mr. Honker

Our responses to your 27 Jan 95 Notice of Deficiencies for Appendix I Phase III RCRA Facility Investigation Workplans are attached for your approval. We will forward the revised final workplans within thirty days of approval.

If you have any questions, please contact Mr. John Constantine at (505) 784-4348.

Sincerely

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

Attachments:  
NOD Responses

cc:  
NMED (B. Hoditschek)  
HQ ACC CES/ESVW w/o Atch (M. Calvert)  
COE Omaha District w/o Atch (T. Thiele)

*Comments by EPA Region VI, dated February 1995.*

**Comment 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.

**Response:** A blank copy of the boring log has been included in SOP No. 8.

- b. This workplan does not include a community relations plan which is required.

**Response:** Cannon AFB is currently revising the Community Relations Plan for the Base. Please refer to that document.

**Comment 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).

**Response:** This will be revised as noted in the final work plan.

- 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.

**Response:** The requested change has been made.

**Comment 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.

**Response:** The requested change has been made.

**Comment 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.

**Response:** Boring 11A was inadvertently left off of the figure in the draft submittal. The boring has been placed on the figure for this submittal.

**Comment 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.

**Response:** The paragraph has been altered slightly to hopefully make it more explanatory. It simply describes the removal of the O/W separator, the testing and off-site disposal of some of the excavated soil, and the backfilling of the excavation with a combination of clean off-site soil and the remaining excavated soil. The reference should have been to Figure 2-2. This has been changed.

- b. The previous investigations discussion should be expanded. It is far too general in scope.

**Response:** The discussion on previous investigations will be expanded in the final work plan.

**Comment 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.

**Response:** The requested change will be made in the final work plan.

- 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.

**Response:** When discussing specific SWMUs within Site SD-11, the SWMU number will be identified.

**Comment 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.

**Response:** W-C is not clear as to the point being made in this comment. Samples will be collected at discreet 5-foot or 10-foot-intervals for field screening and possible chemical analysis. Soil for these samples will only be removed from the split spoon and not between the 5-foot or 10-foot intervals. The procedures are described in SOP No. 7.

- 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?

**Response:** As discussed in Section 4.3.2 and shown on Figure 4-1, four initial borings are planned. Based on the observations in the initial borings, additional borings (up to a total of 700 linear feet of drilling) will be drilled and sampled to define the vertical and lateral extent of contamination. Based on the results of the sampling, all potential remedial actions can then be evaluated.

- 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.

**Response:** The requested discussion of the groundwater has been added to the text. Well No. 9 is being sampled because it is in close proximity to Site SD-11 and to other SWMUs in the area. The sample at this well is meant to be taken as a screening sample to check for potential contamination from any SWMU in the general vicinity.

**Comment 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.

**Response:** The typographical error has been corrected.

- b. This Table should be re-titled SWMU 90 instead of the Site SD-11 designation.

**Response:** This table, and also Table 4-2, will be retitled SWMUs 86-90.

*Comments by Nick Naraine, Project Chemist, USACE, Omaha District, dated February 1995.*

**Comment 1. pg 1-1.** There were a few other investigative studies done at CAFB such as Landfills 3, 4, and 25 by Radian Corp. that are not listed.

**Response:** These additional studies will be listed.

**Comment 2. pg 3-7. Sect. 3.3. Second paragraph.** The statement "Potential chemicals of concern (COC) will be derived from the analyte list described in the QAPP" is not quite true. TICs may play a role in the COC.

**Response:** This will be reviewed and revised if appropriate.

**Comment 3. pg 3-9. Sect. 3.5.** Please insert "the latest revision" before "EPA Region III RBCs."

**Response:** This version was used because the Appendix II and III work plans included them. The latest version will be used for Appendix I, II and III SWMUs.

**Comment 4. pg 3-9. Sect. 3.5.1.** At the time of the writing of this workplan, the latest Region III RBCs is November 8, 1994. Please correct in the first sentence.

**Response:** See response to comment above.

**Comment 5. Figure 3-1.** How did we get from Appendix I to Appendix II & III SWMUs?

**Response:** This figure will be revised.

**Comment 6. pg 4-7. Sect. 4.3.4.** Fourth paragraph on decontamination. Reference to SOP #1 should be also made.

**Response:** The reference to SOP No. 1 has been added.

**Comment 7. Table 4-4.** Typo. The holding time for Mercury is 28 days not 13.

**Response:** The requested change has been made.

**Comment 8. Tables 4-5 through 4-9.** These tables are without any detection limits. Since concentrations in groundwater and soils will be compared to Region III RBCs then the detection limits become critical. See page 3-4, Steps 3 & 4.

**Response:** Detection limits are provided in the QAPP.

**Comment 9. pg 5-1. 5.0 References.** This should be changed adding the work done by Radian Corp. on Landfills 3, 4, and 25.

**Response:** If these documents were to be used, they will be added to the list of references.

**Comment 10. General Comment.**

- a. Either Table 4-1 or another table should indicate that microbial samples will be taken.

**Response:** The microbial samples will be added to Table 4-1.

- b. It is fine to enclose Appendix C, Region III RBCs. Since the investigation is limited to certain COCs then a short list of the RBCs of concern would be more appropriate. It would help with the establishment of detection limits.

**Response:** This work plan and appendix is consistent with the previous submittals for Appendix II and III SWMUs.