



DEPARTMENT OF THE AIR FORCE

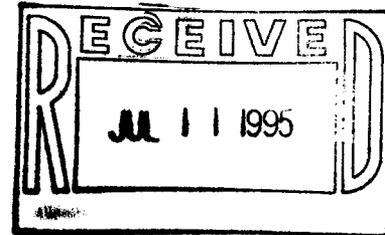
HEADQUARTERS 27th FIGHTER WING (ACC)
CANNON AIR FORCE BASE, NEW MEXICO



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05 JUL 1995

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

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



Dear Mr. Honker

Our responses to your 9 Jun 95, Notice of Deficiencies for Appendix I SWMUs 86-90 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 or Mr. Sanford Hutsell at (505) 784-4348.

Sincerely

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 (D. Mellema)

**RESPONSE TO COMMENTS
DRAFT WORK PLAN
RCRA FACILITY INVESTIGATION
APPENDIX I PHASE III SWMUS 86-90 (SITE SD-11)
CANNON AFB, NEW MEXICO**

Additional Comments by EPA Region VI, dated June 9, 1995.

Comment 1. GENERAL COMMENTS:

- a. Please correct Figure 2-2 to show the correct excavation area at this SWMU.

Response: This has been corrected in the Final Work Plan.

- b. Cannon Air Force Base should submit a project schedule for review and approval.

Response: This has been updated and provided in the Final Work Plan. The revised schedule assumes EPA concurrence with these responses by no later than July 7, 1995 in order to start fieldwork the week of July 24th.

- c. Please clarify in the Work Plan that all soils which were hazardous by TCLP were disposed of off-site.

Response: The text has been revised to indicate that off-site disposal was based on VOC, SVOC, and metals analysis. Note that per the previous report and as stated in the Work Plan some of the excavated soil was placed back in the excavation along with clean soils.

Comment 2. SECTION 2.2.1 - DESCRIPTION OF SITE SD-11:

- a. Please remove from the Work Plan, all references to "Site SD-11" and use the SWMU designation as this is confusing.

Response: The Final Work Plan has been revised to reflect the SWMU numbers(s) in the text, table, or figures. However, we have left in the reference to Site SD-11 (in parentheses) because that is the designation for the site under the Air Force's Installation Restoration Program (IRP). The investigation is intended to meet the requirements of CERCLA and RCRA.

Comment 3. SECTION 2.2.2 - PREVIOUS INVESTIGATIONS

- a. Please clarify and expand this section with maps showing the different phases of the investigation.

Response: There is a map showing the location of soil borings from previous studies. The text has been expanded in the Final Work Plan to further clarify the results of these investigations.

Comment 4. SECTION 2.5 - SCREENING-LEVEL HEALTH RISK EVALUATION METHODOLOGY:

- a. This section is not needed since the extent of contamination should be defined by comparison with background levels of PQL's.

Response: This methodology is not intended to be used to define the extent of contamination. This section describes the approach that will be used to evaluate potential human health impacts at the site. The goal is to make a determination as to whether or not a release had occurred at the site that could pose a potential risk to human health or the environment. This assessment will be used in determining future actions at the site, if any.

Comment 5. SECTION 4.3.2 - SAMPLE LOCATIONS, FREQUENCY, AND ANALYSIS

- a. When drilling boreholes, a sample from the initial 2 feet of soil shall be taken and then at 5-foot intervals thereafter.

Response: The Final Work Plan has been revised to indicate that the surface sample is from the 0- to 2-foot interval. The Work Plan currently states that samples are to be collected at 5-foot intervals to a depth of 40 feet and at 10-foot intervals thereafter. Sampling at 10-foot intervals at depths greater than 40 feet is consistent with previously approved plans (i.e., the Phase I and II RFI of Appendix III SWMUs). Furthermore, with limited funding we believe this approach provides the best value and will provide data of sufficient quantity and quality to make decisions regarding the site.

PROJECT SCHEDULE PHASE III RFI APPENDIX I SITE SD-11 CANNON AFB, NEW MEXICO

Row #	Task Name	Duration	Start	End	1995											
					Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1	NOTICE TO PROCEED	0.00 d	Jan/01/95	Jan/01/95												
2	PROJECT PLANNING	10.00 d	Jan/02/95	Jan/13/95	■											
3	ISSUE DRAFT WORK PLAN	0.00 d	Jan/13/95	Jan/13/95	Δ											
4	REVIEW AND COMMENTS	20.00 d	Jan/17/95	Feb/13/95	■	■										
5	ISSUE FINAL WORK PLAN	0.00 d	Jul/24/95	Jul/24/95												
6	FIELD MOBILIZATION	0.00 d	Jul/24/95	Jul/24/95												
7	FIELD WORK	15.00 d	Jul/24/95	Aug/11/95								Δ	Δ			
8	DEMOBILIZATION	0.00 d	Aug/11/95	Aug/11/95								■				
9	CHEMICAL ANALYSIS	20.00 d	Aug/14/95	Sep/11/95								Δ				
10	DATA VALIDATION	20.00 d	Sep/11/95	Oct/06/95								■	■			
11	ISSUE QCSR	0.00 d	Oct/09/95	Oct/09/95									■			
12	RFI REPORT PREPARATION	45.00 d	Aug/14/95	Oct/17/95											Δ	
13	ISSUE PRE-DRAFT RFI REPORT	0.00 d	Oct/17/95	Oct/17/95									■	■		
14	REVIEW AND COMMENT	10.00 d	Oct/18/95	Oct/31/95											Δ	
15	DRAFT REPORT PREPARATION	10.00 d	Nov/01/95	Nov/14/95											■	
16	ISSUE DRAFT RFI REPORT	0.00 d	Nov/14/95	Nov/14/95											■	
17	REVIEW AND COMMENT	20.00 d	Nov/15/95	Dec/13/95											Δ	
18	PREPARE FINAL RFI REPORT	10.00 d	Dec/14/95	Dec/28/95											■	
19	ISSUE FINAL REPORT	0.00 d	Dec/28/95	Dec/28/95											■	Δ

Revised 2/6/95

Milestone Δ Summary ■

08/26/95

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