

FILE: HSWA/CAFB/APPENDIX II & III
TRACK: CAFB/3-22-96/KOERNER/HODITSCHKEK/NOD



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
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MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

Certified Mail - Return Receipt Requested

March ²² 22, 1996



Michael J. Korner, Colonel, USAF
Commander, 27th Fighter Wing
100 S DL Ingram Blvd., Suite 200
Cannon AFB NM 88103-5217

Dear COL. Korner:

**RE: Notice of Deficiency (NOD)
Appendix II&III Oil/Water Separators, Construction Work Plan
Cannon Air Force Base (CAFB)**

The Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department (NMED) has reviewed the above referenced report, dated September 1995, and has determined it to be deficient.

CAFB shall provide a response to the enclosed list of deficiencies within forty-five (45) days from the receipt of this letter. Please address one copy of your response to me and one to each of the individuals copied on this letter.

Should you have any questions concerning this NOD, please contact Cornelius Amindyas at (505) 827-1561 regarding any permitting issues, or Mr. Stephen Pullen at (505) 827-1558 regarding any technical issues.

Sincerely,

Barbara Hoditschek

for Benito Garcia, Chief
Hazardous and Radioactive Materials Bureau

enclosures

- cc: Ronald Kern, NMED-HRMB
- Barbara Hoditschek, NMED-HRMB
- David Neleigh, EPA
- John Pike, CAFB

LIST OF DEFICIENCIES
CONSTRUCTION WORK PLAN
APPENDIX II AND III
CANNON AIR FORCE BASE
CLOVIS, N.M.
NM7572124454

GENERAL COMMENTS

1. The usages of Removal Action Levels and Cleanup Levels need to be differentiated. Removal action levels are used for project sites which pose immediate threats to human health and the environment. Cleanup levels from confirmation tests should be met, not Removal Action Levels.
2. The analyte parameters; TRPH and BTEX can be used for screening purposes but not for cleanup purposes, because the toxicities of individual compounds in these parameters are varied. The % of benzene in TRPH and BTEX should be verified.

The NMED's cleanup levels for BTEX, 50 ppm and benzene, 10 ppm appear too high to protect human health.

Although EPA does not have cleanup standards for TRPH and BTEX, the risk-based cleanup criteria(RBC) is 3.2 ppm for benzene(See, Region 9 Preliminary Remediation Goals, February 1, 1995). This is the level calculated using the industrial land use scenario, and assuming that no contaminated soil has impacted the ground water.

3. EPA recommends that the individual VOCs and SVOCs be analyzed and the cleanup levels for detected compounds should be established based on risk-based concentrations(RBCs), background values, or sample quantitation limits, but not the TCLP levels indicated in Table 1 of the Work Plan.
4. All measured chromium values should be assumed to be in a hexavalent state for the Risk Assessment. An alternative approach would be to analyze samples for valence specific chromium.
5. Cell #1 shall be used to landfill soils associated with UST removal operations, and Cell #2 shall be used to landfill soils associated with OWS, sand traps, leach well, drain, and associated piping removal operations. A Storage Cell (#3 ?) for storage of soil prior to remediation shall be constructed adjacent to landfarm Cells 1 and 2. It is not clear if soils intended for Cells 1 and 2 may be mixed in this Storage Cell. Metals concentrations from OWS type units may be higher than those from the UST type units.

Dilution of metals concentrations by mixing the soils from two sources in Storage Cell 3 is a regulatory concern.

6. In summary, the following are soil cleanup levels for an industrial land use scenario recommended by EPA for Cannon AFB.

<u>Analyte</u>	<u>Cleanup level, ppm</u>	<u>Rationale</u>
TRPH	100	NMED level
BTEX	10	EPA recommended
Benzene	3.2	Region 9 RBC
VOCS	depends on analytes	RBC
SVOCs	depends on analytes	RBC or background
Arsenic	around 6	site background
Barium	1,000	Region 9 RBC ceiling
Cadmium	100	Table 1
Chromium, hexa	230	Region 9 RBC
Lead	500	Table 1
Mercury	20	Table 1
Selenium	100	Table 1
Silver	500	Table 1
Antimony	6.75	Table 1
Beryllium	0.73	Table 1
Cobalt	4.5	Table 1
Copper	5.4	Table 1
Manganese	164	Table 1
Nickel	9	Table 1
Thallium	0.5	Table 1
Zinc	21.9	Table 1

SPECIFIC COMMENTS

1. Table 1 page 5: Removal Action Levels and Cleanup Levels for VOC's, SVOC's, and 8 metals were determined by using EPA Methods 1311. TCLP levels are used to determine hazardous wastes. EPA does not set cleanup levels for this suite of constituents. EPA Method 1311 is not necessary for sample analysis.
2. Drawing #1 (SWMU Layout) does not show SWMU # 92.
3. Section 2.0 (Existing Site Conditions) text refers to SWMU's 32 and 33, however, Drawing #1 shows SWMU'S 32A and 33B.
4. Section 3.6.1. page 18 line 27 and 28. Field screening of the concrete or asphalt pavement waste materials before disposal should be added to this plan.

5. Documentation Requirements. The procedures describing how field measurements are reviewed and validated should be specified. This should include formulas used to calculate results, and procedures used to verify that field measurements are correct.

6. Section 4.0 Sampling and Analysis Plan. The following information should be included in the plan:
 1. Data quality objectives.
 2. Detection limits.
 3. Name of analytical laboratory.
 4. Sample preservation and holding times.
 5. Criteria for data acceptance and rejection.

ENVIRONMENT DEPARTMENT ROUTING SLIP

Letter To: Col. Komer (CAFB)

For: _____ SIGNATURE

Drafted By: Steve Poles _____ Date: March 5, 1996

Subject: NOB on RFI (DRAFTED BY EPA)

FINAL DECISION NEEDED BY: ASAP REASON: CAFB will lose funding opportunity.

CONTACT FOR INFORMATION: Steve Poles

Review:

		Initial	Date Rec'd	Date Apprv'd
1.	<u>Bob Kern</u> PROGRAM MANAGER	<u>RAK</u>	<u>3/6/96</u>	<u>3/6/96</u>
3.	<u>BENITO GARCIA</u> ^{BH Acting} BUREAU CHIEF	<u>BH</u>	<u>3/18</u>	<u>3/18</u>
2.	<u>BARBARA HODITSCHKE</u> ^{PROGRAM MANAGER} DISTRICT MANAGERS	<u>BH</u>	<u>3/18</u>	<u>3/18</u>
	GRANTS			
	ACCOUNTING			
	BUDGETS			
	LEGAL REVIEW			
	ASD DIRECTOR			
	ED KELLEY WWM DIRECTOR			
	EPD DIRECTOR			
	EDGAR THORNTON DEPUTY SECRETARY			
	MARK WEIDLER SECRETARY			
	BILL WILLIAMS DIR. OF COMM.			
	<u>Cornelia Amendygas</u> OTHER Fac. Proj Leader	<u>CA</u>	<u>3/7/96</u>	<u>3/8/96</u>
	CLAUDINE JARAMILLO ADM. SEC.	<u>E</u>		

COMMENTS BY DRAFTER OR REVIEWER(S):

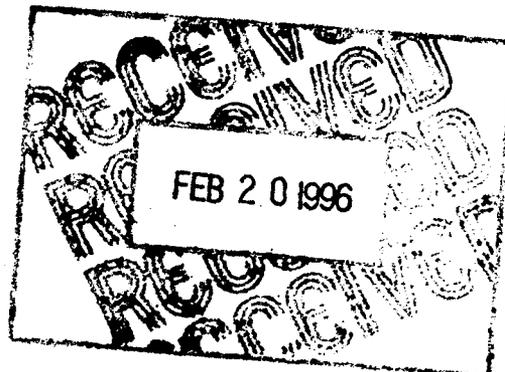
THE ATTACHED LIST OF REVIEWERS WAS PREPARED BY EPA ACCORDING TO THE "WORK SHEET".
THE SITES IN THIS WORK PLAN ARE SUPERFICIAL BUT NOT IRP ELIGIBLE, SO DESMOA FUNDS
CANNOT BE USED FOR REVIEW. A REVIEW OF COMMENTS HAS SHOWN THEM TO
BE APPROPRIATE. CAFB IS PROPOSING A LANDFARM FOR ITS PETROLEUM CONTAMINATED,
NON-HAZARDOUS SOILS. EPA COVER LETTER ATTACHED



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

*Ron K A
Steve P
Barbara*

FEB 15 1996



Mr. Benito Garcia, Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044A Galisteo
Santa Fe, NM 87505

**Re: List Of Deficiencies Construction Work Plan Appendix II
and III Cannon Air Force Base N.M. NM7572124454**

Dear Mr. Garcia:

We have completed our review of the Construction Work Plan for Appendix II and III SWMU's at Cannon Air Force Base dated September 1995. The document was reviewed by the Federal Facilities RCRA Permits Group and the Risk Assessment Group.

EPA believes the enclosed comments should be addressed to the satisfaction of the regulatory agencies. We suggest that the New Mexico Environment Department combine the responses from both agencies into a single Notice of Deficiency for submittal to Cannon Air Force Base.

If you have any questions, please contact Mr. Bob Sturdivant of my staff at (214) 665-7440.

Sincerely,

David Neleigh
David Neleigh, Chief
New Mexico and Federal
Facilities Section

Enclosure

cc: Mr. Steve Pullen
New Mexico Environment Department