



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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



MAY 2 19 1996



*Barbara -  
pls provide a  
letter for my  
signature  
6/4/96*

Mr. Benito Garcia, Bureau Chief  
Hazardous and Radioactive Materials Bureau  
New Mexico Environment Department  
2044A Galisteo Street  
Santa Fe, N.M. 87502

**Re: Comments on Notice of Deficiency Responses  
Construction Work Plan Appendix II and III SWMUS  
Cannon Air Force Base, N.M. NM7572124454**

Dear Mr. Garcia:

We have completed our review of the Response to the Notice of Deficiencies for the Construction Work Plan Appendix II and III SWMUS at Cannon Air Force Base dated May 1996.

The Environmental Protection Agency believes that the Responses to General Comments 1,2,3,5, and 6 are acceptable. However, Comment No. 4 addresses sample analysis for hexavalent chromium (Cr VI). Chromium exists in three forms: Metallic (Cr O), Trivalent (Cr III), and Hexavalent (Cr VI). Cr III occurs naturally in the environment, while Cr O and Cr VI are generally process derived. Valence specific analysis instead of total analysis for chromium is recommended since Cr VI is a known carcinogen.

The Response to Specific Comments 1,2,3,4,5, and 6 are satisfactory. We recommend that the responses be incorporated into the Construction Work Plan with subsequent approval and implementation.

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

cc: Mr. Steve Pullen  
New Mexico Environmental Department

*FILE: ASMA/CAFE / APPENDIX II & III  
TRACK: CAES/S-24-96 / 6-12-96/GARCIA/NELEIGH/  
APPENDIX II III EPA COMMENTS ON  
CAFE RESPONSE TO EPA NED CONSTRUCTION  
WORK PLAN*