



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

Barbara ⁵⁸

JUN 13 1996



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

**Re: Comments on the Data Collection Quality Assurance Plan and
the Site Safety and Health Plan
Fire Training Area # 4 SWMUs 109, 110, 111, 112
Cannon Air Force Base NM7572124454**

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has completed a review of the Cannon Air Force Base Data Collection Quality Assurance Plan (DCQAP), and the Site Safety and Health Plan (SSHP) for Fire Training Area #4 which includes Solid Waste Management Units (SWMUs) 109, 110, 111, and 112. These documents are dated January 1996. The DCQAP presents the field and laboratory procedures, and Quality Assurance requirements to investigate potential hazardous waste releases from Fire Training Area #4. The SSHP establishes guidelines and requirements for the health and safety of personnel during field activities.

The documents and enclosed comments were reviewed by a Peer Review Committee. A reference is provided for each comment. The references should be removed before comments are sent to the facility.

The EPA believes the plan is approvable after submittal of the additional information requested in the enclosed comments.

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

COMMENTS
DATA COLLECTION QUALITY ASSURANCE PLAN
FIRE TRAINING AREA #4 SWMUs 109,110,111,112
CANNON AIR FORCE BASE N.M.

GENERAL COMMENTS

The document should be retitled as a work plan to include the phase number, and the SWMU numbers.

Best Professional Judgement

SPECIFIC COMMENTS

Section 1.3.1 Description: The Oil/Water Separator # 2336 (SWMU 112) was used to collect unburned fuel runoff from SWMU 109. What was the disposition of the contents during operation? Describe any effluent discharge from this unit. Has removal of this Oil/Water Separator been discussed or considered?

Best Professional Judgement

Section 1.3.2. Potential Contaminants: Since there are 4 SWMUs in this area, expand the discussion on previous investigations to include maps of each SWMU, borehole locations, and concentration amounts from analytical results.

RFI Guidance OSWER 9502.00-6D May 1989

Section 1.4 Analytical Parameters and Methods: This section states that 10 surface soil samples will be collected, and Section 4.2.2.2 Sample Location and Frequencies calls for 12 surface soil samples.

Best Professional Judgement

Section 2.3 Performance and Systems Audits: A Field Activities Audit should also examine sample labels, Chain of Custody Records, and Field Notebooks for completeness and accuracy.

RFI Guidance OSWER 9502.00-6D May 1989

Table 4.2 Summary of Sampling: When samples are collected for Volatile Organic Analysis, a Trip Blank is also recommended for each day that samples are collected.

EPA Quality Assurance Program Rev 1 July 1992

Section 6.8 Data Reduction, Validation, and Documentation: Describe the procedures for identifying and reporting "outliers".

RFI Guidance OSWER 9502.00-6D May 1989