



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



June 25, 1996



Mr. Benito Garcia, Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
P.O. Box 26110
Santa Fe, N.M. 87502

**Re: EPA Comments Draft RFI Report - SWMUs 86-90
Cannon AFB, N.M. NM7572124454**

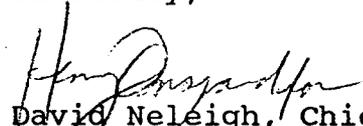
Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has completed a review of the Draft RFI Report for SWMUs 86-90 at Cannon Air Force Base, New Mexico. The following documents were used in this review: Draft RFI Report SWMUs 86-90 Appendix I Phase III, and the RFI Work Plan Appendix I Phase III approved September 7, 1995. This document has been peer reviewed.

We believe the attached comments should be addressed prior to recommending approval of the report which requests No Further Action. NMED should rule on comments 4 and 6. A reference has been provided for each comment according to your request.

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

Sincerely,


David Neleigh, Chief
New Mexico and Federal
Facilities Section

Enclosure

cc: Mr. Steve Pullen
New Mexico Environment Department

EPA COMMENTS
DRAFT RFI REPORT
SWMUS 86-90
CANNON AFB N.M.

GENERAL COMMENTS

1. Contaminated soils were mixed with clean soils and used as backfill. Residuals may pose a problem. What was the hazardous waste classification and level of contamination of the soil used in the backfill?

Best Professional Judgement

2. Contaminants of Concern should not present a risk to human health or the environment; however, the following issues should be addressed prior to recommending further investigation or no further action.

40 CFR 270 Protective of human health and the environment

SPECIFIC COMMENTS

1. Section 3.1 RFI Objectives and Approach: An objective should be added to perform a screening-level risk evaluation to evaluate ecological risks associated with chemicals found at the SWMUs.

40 CFR 270 Protective of human health and the environment

2. Section 3.3.1 Decision Process: It is not acceptable to use human health risk-based screening concentrations to select chemicals of concern for an ecological risk assessment. Ecological risk for this assessment could probably be addressed through evaluation of whether there are any complete ecological exposure pathways. Justification for no ecological risk should be provided.

Best Professional Judgement and 40 CFR 270

3. Section 3.7 Screening-Level Health Risk Evaluation: The numbers used in screening-level human health risk assessment do not account for additive risk for non-carcinogens. This will not affect results of the risk assessment for these SWMUs. Region III Technical Guidance entitled " Selecting Exposure Routes and Contaminants of Concern by Risk-Based Screening" could be used for the screening-level risk assesment.

40 CFR 270 Protective of human health and the environment

4. Section 4.3 Previous Investigations: The remaining soil was mixed with clean off site soil and used to backfill the excavation. Appendix E Section 3.10F states that the Corps of Engineers directed that site soil be placed back in the site excavation, however no documentation is attached as Section F. Results of sampling at borings 8611 and 8612 (Table 7-2) shows TPH concentrations of 5010 mg/kg at 14 feet, 5390 mg/kg at 9 feet, and 3230 mg/kg at 14 feet. It appears the soil used as backfill at this site had concentrations well above 1000 mg/kg state regulatory levels. The state should determine whether it was appropriate to dilute these excavated soils and use it as backfill at this site.

Not all of the SWMUs are shown on Figure 4-2. The previous investigations should be discussed by SWMU number with a separate map for each SWMU.

Best Professional Judgement

5. Section 5.4 Ground Water Sampling: Provide a ground water gradient map showing ground water flow direction and rate.

40 CFR 270.14 (c)(2)

6. Section 8.1.2 Soils: Why is the backfill petroleum stained? NMED should determine if the diluted soils used as backfill were within regulatory guidelines.

See General Comment #1

7. Section 9.1 Physical Characteristics: "The depth of the zone of backfill placed for the removal of the oil/water separator system is about 15 feet at its deepest point." This contradicts Page 4-5 which indicates the excavation depth was 25 feet.

Best Professional Judgement

8. Section 9.2 Recommendations: It appears that the vertical extent of contamination has been determined, but the horizontal extent has not been established. Further investigation is recommended before declaring no further action.

40 CFR 270.14 Protective of human health and the environment and Best Professional Judgement