



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

*Jerry B.
Please discuss
w/ me + Project
Office
10/19/96*



NOV 14 1996



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

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has completed its review of the Draft RFI Report for Landfill 1 SWMU 74 at Cannon Air Force Base and offers the attached comments for your consideration.

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

Sincerely yours,

David W. Neleigh, Chief
New Mexico/Federal Facilities
Section

Enclosure

FILE: HSLUA/CAEB/LANFILL 1
TRACK: CAEB/11-14-96/11-18-96/GARCIA/NELEIGH/41 RFI REPORT EPA COMMENTS

EPA COMMENTS
CANNON AIR FORCE BASE
DRAFT RFI REPORT PHASE I LANDFILL 1 SWMU 74

How long this
comment affects
decision to allow
or deny -

GENERAL COMMENTS

1. The nature of a landfill operation before regulation would have allowed contaminants to be spread in a random pattern over the entire landfill area. Subsequent operations may reveal hot spots that will require action.
Best Professional Judgement.
2. The production well near Landfill 1 should be sampled as a precautionary measure.
Best Professional Judgement.
3. A Hazard Quotient (HQ) of 1.0 was used to select non-carcinogens. A HQ of 0.1 should be used instead. 1.0 is used for risk management decisions, but not for the selection of chemicals of interest.
Reference "Selection Exposure Routes and Contaminants of Concern by Risk Based Screening" EPA Region III.

- for?
need to discuss
need explanation
we H 9 for
with
minim
it relates
to survey

SPECIFIC COMMENTS

1. Analytical results indicate minimal organic contamination, however, the PID readings seem high (4-8 ppm). What was the background reading for the PID instrument? Cannon should have a background reading for each boring.
Best Professional Judgement.
2. Table 3-2 Drum Inventory List. How will the 27 drums of Investigation Derived Waste (IDW) stored in the drum staging area be characterized and disposed of?
3. The report states that chemicals were excluded as COIs if they did not have a Region III RBC. If a chemical does not have a toxicity value, a surrogate chemical with similar chemical structure could be used in it's place. Example: Anthracene can be used as a surrogate for phenanthrene. If detections are at relatively high concentrations, contact the regulatory agency for guidance.
Best Professional Judgement
4. Table 7-2: The table states that two federally listed endangered species are known to inhabit the area. Please provide the names of those endangered species.
Endangered Species Act 50 CFR 200 and 50 CFR 402.

Don't analyze the
data used for making
decision
other
PID readings

How
many
additional
COI's
would this
make?