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July 30, 1997

Bob Sturdivant  
Environmental Scientist  
New Mexico/Federal Facilities Section  
U.S. Environmental Protection Agency  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733

Subject: Cannon AFB Post-Closure Plan

Dear Mr. Sturdivant:

As we discussed on the phone last week, enclosed are copies of pages 46-52 from the above-referenced report, with my handwritten comments. I would appreciate it if EPA could provide technical assistance to our Bureau by reviewing this section of the plan and submitting comments to me.

My concern is that there are more rounds of statistical analysis proposed than are necessary, and I would like to know if there could be a simpler approach in which any detection above MCLs would immediately be cause for further investigation to determine the source. I understand the need for some kind of confirmation of the accuracy of the detection and of the source of the detected constituent before corrective measures are implemented, but I am concerned that the amount of statistical analysis proposed here would significantly and unnecessarily delay a remedial response.

The statistical analysis under 40 CFR §264.97(h) required during post-closure care appears designed to determine if contamination exists above background levels. At Cannon AFB, there should be no existing contamination, so no analysis should be necessary to establish monitoring parameters. Instead, I believe we should use MCLs as the parameters. To comply with 40 CFR §264.97, the MCLs could be considered control limits under §264.97(h)(4).

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I appreciate your assistance. Please call me if you have any questions or if you need a copy of the whole plan or any additional information.

Sincerely,



Carl Will  
Environmental Scientist

cc: Jerry Bober

file: red/CAFB/97

track: CAFB/7-30-97/Sturdivant/Will/request for EPA review of L5 Post-Closure Care Plan

J  
10/14/97