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Certified Mail
Return Receipt Requested

August 22, 1997

Michael J. Koerner, Colonel, USAF
Commander
100 S DL Ingram Blvd., Suite 100
Cannon Air Force Base, NM 88103-5714

Subject: Request for Supplemental Information (SI): Cannon Air Force Base
(CAFB) Final Site Inspection Report (Report) - Area of Concern-D (AOC-D)
Contract No. DACW45-94-D-0049

Dear Colonel Koerner:

The Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department (NMED) has reviewed the above-referenced Report, as required under the New Mexico Hazardous Waste Management Regulations.

HRMB has comments on the Report which must be addressed before HRMB can complete its review of the Report. The comments are described in the enclosed Attachment A.

CAFB must respond to this SI within thirty (30) calendar days of receipt of this letter. Failure to respond within this designated time period will result in issuance of a Notice of Deficiency for the Report.

Colonel Koerner
August 22, 1997
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If you have any questions please contact Carl Will of my staff at 505-827-1561.

Sincerely,



Robert S. ("Stu") Dinwiddie, Ph.D., Manager
RCRA Permits Management Program

Attachment

cc: David Neleigh, EPA Region 6
Bob Sturdivant, EPA Region 6
Jerry Bober, HRMB
Carl Will, HRMB

file: HSWA/CAFB/12
track: CAFB/8-22-97/Koerner/Dinwiddie/AOC-D SI

ATTACHMENT A

REQUEST FOR SUPPLEMENTAL INFORMATION:

TECHNICAL ADEQUACY REVIEW OF FINAL SITE INSPECTION REPORT FOR AREA OF CONCERN-D, SUBMITTED BY CANNON AIR FORCE BASE, NEW MEXICO

August 22, 1997

1.0. Executive Summary

The Workplan states, at pages 3-4 and 3-5, that if headspace screening indicates the presence of VOC, a boring will be completed to 20 feet below the debris native soil interface and three samples will be taken from the boring. The Report does not state that headspace screening was done for all borings. At page 1-1, paragraph three, line two, revise to state that no visible PACM was encountered and headspace screening results were at or below background levels, and thus no soil samples were collected.

2.2. Project Objectives

At page 2-2, revise to include as a completed task that headspace screening was done for all nine borings.

2.4. Previous Site Investigations

HRMB was given verbal assurance that there was no historical evidence of disposal of other than construction debris at AOC-D. At page 2-14, the Report states that information provided by the Base and USACE indicates that the site may have received unknown contaminants or contaminant sources. Include a more specific statement in the Report about what information is known, if any, about the possibility of hazardous constituents having been disposed of at the site.

3.2. Subsurface Drilling

At page 3-1, line 12, revise to state that headspace screening results were at or below background for all six borings. At line 16, revise to state that headspace screening results were at or below background for borings SB-07 and SB-09.

3.3.2. Soil Sampling

At page 3-2, paragraph one, line three, revise to state that headspace screening results for split spoons from all nine borings were at or below background levels.

4.0. Analytical Results

No results are given in the Report for the headspace

screening for each boring, other than the information given in the drilling logs at Appendix II. The drilling logs describe Field Screening Results, in column d, as "HS=0," for SB-01 through SB-06, SB-08, and SB-09, and "HS=2," for two depths in SB-07. There is no explanation of what those numbers mean in terms of units or analytes nor what their relationship is to background levels. Include in the Report the headspace screening detection limits, quality control and assurance, analytes, results, and how background levels were determined for the headspace screening for all nine borings.

4.1. Chemical Results

At page 4-1, paragraph two, line four, include a statement that metals listed in Table 4-3 of the Workplan but not included in Table 4-2 of the Report were tested for and not detected. The metals in question are beryllium, cadmium, mercury, selenium, silver, and thallium.