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Certified Mail
Return Receipt Requested

December 23, 1997

David E. Clary, Colonel, USAF
Commander
100 S. DL Ingram Blvd., Suite 100
Cannon Air Force Base, NM 88103-5214

Subject: Request for Supplemental Information:
Phase II RCRA Facility Investigation Report
Fire Training Area No. 4 (SWMU Nos. 109, 110, 111, 112)
Cannon Air Force Base

Dear Colonel Clary:

The Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department (NMED) has reviewed the above-referenced Report, dated August 29, 1997, as required under the New Mexico Hazardous Waste Management Regulations.

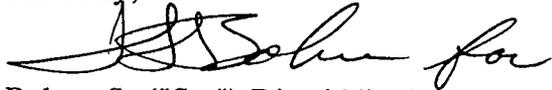
HRMB has comments on the Report which must be addressed in order for us to complete our review. These comments are enclosed as Attachment A.

Your response to these comments must be submitted within 30 days of receipt of this letter.

Colonel Clary
December 23, 1997
Page 2

If you have any questions please contact Carl Will of my staff at 505-827-1561.

Sincerely,

A handwritten signature in black ink, appearing to read "Stu" followed by a flourish.

Robert S. ("Stu") Dinwiddie, Ph.D., Manager
RCRA Permits Management Program
Hazardous and Radioactive Materials Bureau

Attachment

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

ATTACHMENT A

COMMENTS ON CAFB PHASE II RCRA FACILITY INVESTIGATION REPORT, FIRE TRAINING AREA NO. 4

December 23, 1997

The sections and titles in bold print preceding each comment are taken directly from the Report.

4.0 Applicable or Relevant and Appropriate Requirements

Table 4-1 lists the New Mexico Underground Storage Tank regulations as an Applicable or Relevant and Appropriate Requirement (ARAR) regarding soils contaminated with petroleum hydrocarbons. Specify how this ARAR will be adhered to.

5.0 Investigation Results

5.4 Nature and Extent of Contamination

It is HRMB policy to require two consecutive non-detects to delineate contamination in the vertical direction. Because there are SVOC and TPH detections at the deepest sampling points of several borings, the vertical extent of contamination has not been determined with certainty. For this reason, HRMB would like to be sure that groundwater monitoring exists that will detect releases to groundwater if such releases occur. Submit information on groundwater flow that indicates whether existing monitor wells for Landfill No. 5 will detect releases to groundwater from Fire Training Area No. 4. The probability of releases to groundwater is low enough that it may not be necessary to install an additional well for FTA-4 only. However, if existing monitor wells are not adequate, HRMB would like to discuss the possibility of installing an additional well in a location that might detect releases from both FTA-4 and Landfill No. 5. This could possibly be done when new monitor wells are required for Landfill No. 5 because of dropping water tables.

5.4.2.1 Volatile Organic Compounds

5.4.2.2 Semi-Volatile Organic Compounds

The text states that only SB01 contained detectable VOC's. Table 5-5 indicates unqualified detections of acetone and methylene chloride as well. The text states that only two SVOC's were detected, while Table 5-5 indicates that there were several unqualified detections of a third SVOC, di-N-butylphthalate. Explain the discrepancy or revise the text to accurately describe all detections above method reporting limits (MRL's) and background levels.

"Detection" is defined, at page 5-9, line 12, as concentrations above the MRL's. Include a table of MRL's.

5.4.2.4 Total Recoverable Petroleum Hydrocarbons

Submit a Corrective Measures Study (CMS) Workplan for reduction of Total Petroleum Hydrocarbons (TPH) to below HRMB's cleanup level of 1,000 mg/kg. TPH was detected at the site at up to 14,400 mg/kg.

Table 5-5

Include an explanation of the "J" flag or code used in the table, i.e., why the values are estimated. Values can be estimated for various reasons with differing impacts on the reliability of the data.

7.0 Human Health Evaluation

7.2 Chemical of Potential Concern

7.2.1 Data Evaluation and Treatment

Page 7-1, line 27 references a Quality Control Summary Report (Harza, June 30, 1997). Submit a copy of this report to HRMB.

7.3 Exposure Assessment

7.3.1 Characterization of Exposure Setting

Because the human health risk assessment is not based on the most conservative exposure scenario (i.e., residential), approval of the human health risk assessment is pending HRMB review of Department of Defense (DoD) base closure procedures that provide notice to future property owners that risk has not been assessed for residential use. HRMB is reviewing CAFB's November 21, 1997 response to HRMB's comment regarding this issue contained in the September 19, 1997 Notice of Deficiency for Appendix II & III SWMU's.

7.3.2 Identification of Potential Exposure Pathways

At page 7-6, the Report states that military personnel spend 15.6 days per year at the site, construction workers will work at the site 45 days per year, and visitors and trespassers visit the site 50 days a year for 30 years. What is the source of these exposure figures and are these numbers being used consistently throughout the Air Force or the DoD?



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Fax Cover Sheet

Date: 12/30/97

To: SANFORD HUTSELL
Company: CAFB
Phone: 505-784-6378
Fax: 1093

From: CARC WICK
Company: Hazardous & Radioactive Materials
Phone: (505) 827-1558

Pages
including this 5
cover page:



Comments: I FORGOT TO FAX THIS
TO YOU WHEN IT WAS MADE
LAST WEEK.