

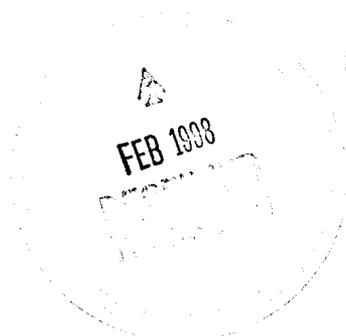


DEPARTMENT OF THE AIR FORCE

HEADQUARTERS 27th FIGHTER WING (ACC)
CANNON AIR FORCE BASE NEW MEXICO



25 FEB 1998



Colonel James A. Thomas III
Commander, 27th Support Group
110 E Sextant Avenue Suite 1098
Cannon AFB NM 88103-5323

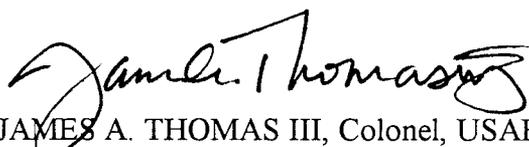
Mr. Benito J. Garcia, Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo Street
PO Box 26110
Santa Fe NM 87502

Dear Mr. Garcia

Enclosed is our response to your 23 Dec 97 Request for Supplemental Information on the Phase II RFI Report for Fire Training Area Number 4, (SWMUs 109-112).

If you have any questions, please contact Mr. Sanford Hutsell at (505) 784-6378 or Mr. John Pike at (505) 784-1092.

Sincerely


JAMES A. THOMAS III, Colonel, USAF

Attachment:
Response to Request for Supplemental Information

cc:
NMED (C. Will)
NMED GW Bureau (J. Jacobs)
EPA Region VI (D. Neleigh)
HQ ACC/CEVC (R. Shannon)

**CANNON AIR FORCE BASE
CLOVIS, NEW MEXICO**

**RESPONSE TO COMMENTS BY
STATE OF NEW MEXICO ENVIRONMENT DEPARTMENT
HAZARDOUS & RADIOACTIVE MATERIALS BUREAU
PHASE II RCRA FACILITY INVESTIGATION REPORT
FIRE TRAINING AREA NO. 4 (FTA-4)
Dated December 23, 1997**

1. **Comment. Section 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.

Response. The UST regulations are ARARs based on the levels of Total Petroleum Hydrocarbons (TPH) detected at the site. The text will be modified to reflect that an ARAR has been exceeded. A CMS to reduce TPH at the site would describe how the ARAR would be adhered to. See response to comment number 4.

2. **Comment. Section 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.

Response. Most, if not all, of the monitoring wells for Landfill No. 5 are located in the downgradient flow direction from FTA-4. The closest monitoring wells (MW-A and MW-Q) are upgradient monitoring wells for Landfill No. 5. They are located in relatively close proximity to FTA-4. Additional information will be added to the text of the report discussing groundwater flow direction at the base and monitoring wells that would provide information in the unlikely event that a

release occurred at FTA-4. We concur that an additional well to solely monitor FTA-4 is not needed.

3. **Comment. Sections 5.4.2.1 and 5.4.2.2. Volatile Organic Compounds and 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.

Response. Methylene chloride, acetone, and di-n-butylphthalate were detected in many of the samples and in many, but not all, laboratory blanks. Concentrations in the samples and blanks, where detected, were similar. These also are common laboratory contaminants. Although not always flagged "B", their occurrence is judged to be attributable to laboratory contamination. Text will be added to these sections providing additional explanation.

MRL's are sample-specific. A table providing all MRL's would have to include each sample and each constituent analyzed. MRL's are provided on the appended laboratory data sheets and a table of typical MRLs for the soil VOC and SVOC could be generated. A specific reference to the locations of documents for MRL's will be provided.

4. **Comment. Section 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.

Response. Funding is not available to conduct a CMS at FTA-4 at this time. Funding will be requested from Air Combat Command (ACC).

5. **Comment. 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.

Response. "J" flags are used as defined by USEPA for data qualifiers, and an explanation is provided in the QCSR. Essentially, the "J" flag is used to indicate detections above the equipment detection limit, but below the quantitation limit and thus estimated. It is also used when spike recoveries are outside specified quality control windows and when values present exceed the instrument calibration range. The note on the table will be expanded.

6. **Comment. Section 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.

Response. A copy of the QCSR was sent to HRMB after receipt of the original HRMB supplemental information request (comments).

7. **Comment. Section 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 and III SWMU's.

Response. Additional text will be included to explain in more detail why a residential scenario was not addressed in this risk assessment. The explanation will include a discussion of Cannon AFB's Base Comprehensive Plan (BCP) which has present and future land use specifications for Fire Training Area No. 4. The Base's Real Estate Division and Planning Department area also aware of what is included in the BCP as long as the base continues to operate as a military facility. In the unlikely event that Cannon AFB should close, the Base Realignment and Closure (BRAC) will re-evaluate the land-use scenarios before the property is released for sale.

8. **Comment. Section 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 DoD?

Response. The Department of Defense and the Air Force do not have any policy concerning standard default exposure factors for military personnel. The exposure scenarios were based on professional judgement considering site conditions, foreseeable land use at FTA-4 and the continuing active operations at CAFB. Further explanation will be provided in the text as to how these exposure factors were derived and the text will be sent to NMED for approval prior to incorporation into the revised final report.

REQUISITION AND INVOICE / SHIPPING DOCUMENT

Form Approved
OMB No. 0704-0246
Expires Dec 13, 1996

Public reporting burden for this collection of information is estimated to average 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Washington Headquarters Services, Directorate for Information Operations and Reports, 1215 Jefferson Davis Highway, Suite 1204, Arlington, VA 22202-4302, and to the Office of Management and Budget, Paperwork Reduction Project (0704-0246), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO EITHER OF THESE ADDRESSES, RETURN COMPLETED FORM TO THE ADDRESS IN ITEM 2

1. FROM: (Include ZIP Code) 27 CE/CEV 506 N DL Ingram Blvd Cannon AFB NM 88103-5136			SHEET NO 1	NO. OF SHEETS 1	REQUISITION DATE 98/02/25	6. REQUISITION NUMBER
2. TO: (Include ZIP Code) New Mexico Environment Department Hazardous & Radioactive Management Bureau Administrative & Special Programs 2044 Galisteo Santa Fe, New Mexico 875075			7. DATE MATERIAL REQUIRED (YYMMDD) 98/02/26		8. PRIORITY	
3. SHIP TO - MARK FOR ATTN: Mr. Benito Garcia (505)827-1557			9. AUTHORITY OR PURPOSE See Attached Letter			10. SIGNATURE <i>Christine Shifflett</i>
			11a. VOUCHER NUMBER & DATE (YYMMDD) C. Shifflett		11b. VOUCHER NUMBER & DATE (YYMMDD) 27 CE/CEV x6022	
			12. DATE SHIPPED (YYMMDD)		13. MODE OF SHIPMENT Federal Express JP-1	
			14. BILL OF LADING NUMBER		15. AIR MOVEMENT DESIGNATOR OR PORT REFERENCE NO.	

4. APPROPRIATIONS SYMBOL AND SUBHEAD	OBJECT CLASS	EXPENDITURE ACCOUNT (From) (To)	CHARGEABLE ACTIVITY	BUREAU CONTROL ACTIVITY NO.	BUREAU CONTROL NO.	AMOUNT
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ITEM NO.	FEDERAL STOCK NUMBER, DESCRIPTION, AND CODING OF MATERIAL AND / OR SERVICES (b)	UNIT OF ISSUE (c)	QUANTITY REQUESTED (d)	SUPPLY ACTION (e)	TYPE CONTAINER (f)	CON. TAINER NOS. (g)	UNIT PRICE (h)	TOTAL COST (i)
01	Response to Request for Supplemental Information on FTA-4 package. I certify that this shipment does not contain any hazardous or classified material. cs <i>CS</i>							

16. TRANSPORTATION VIA MATS OR MSTs CHARGEABLE TO

16. TRANSPORTATION VIA MATS OR MSTs CHARGEABLE TO				17. SPECIAL HANDLING					
ISSUED BY	TOTAL CONTAINERS	TYPE CONTAINER	DESCRIPTION	TOTAL WEIGHT	TOTAL CUBE	CONTAINERS RECEIVED EXCEPT AS NOTED	DATE (YYMMDD)	BY	SHEET TOTAL
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