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

June 16, 1998

Mr. Benito J. Garcia, Chief
Hazardous & Radioactive Materials Bureau
2044 Galisteo Street
P. O. Box 26110
Santa Fe, NM 87502

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has completed a review of the two volume Corrective Measures Completion Report for nineteen oil/water separators at Cannon Air Force Base.

The enclosed comments are for your consideration in determining the adequacy of the report.

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

Sincerely,

David Neleigh, Chief
New Mexico and Federal Facilities
Section

Enclosure

cc: Carl Will
New Mexico Environment Department

COMMENTS

SWMU 1 Page 4-2 Unit Contents and subsequent SWMUs which contained liquids and sludge. Cannon states that laboratory analysis for this material is reproduced in Appendix I;however, no liquid results were found, only sludge and soil.

SWMU 1 Soil Sampling Page 4-3: Sample locations 2 and 4 were collected from the east and west walls 2 feet below the top of the surface. Sample information in Volume 2 lists these samples as taken at a depth of 11 feet. Please clarify.

Page 4-4 Table 4.1-1 and all subsequent Summary Soil Sample Results Tables: Reference the RFI Work Plan Section 3.11.1.4 RCRA Metals TCLP Testing. This section states that a total RCRA Analysis for metals will be performed at the bottom of each excavation. In this report, the Summary Soil Sample Results Tables only show TCLP Metals. It is not clear whether TCLP testing was used for verification sampling or for the determination of hazardous wastes. The Soil Sample Summary Results Tables should also show total metals.

Risk Evaluation Page 4-7 Table 4.1-3: The Region 6 Residential RBSL values for barium, nickel, and lead are an order of magnitude less than what they should be. Lead should be 400 ppm instead of 40.0 ppm

General Comment: Laboratory duplicate results which were performed at each SWMU should be included in this report.

Page 4-10; Soil Sampling, last paragraph: Why did on-site personnel feel that sample #8 was not representative of the excavated material? Why were analytical results believed to be in error? Where was Sample #8 taken in relation to Samples #7 and #10?

Page 4-26 Soil Sampling: Cannon needs to identify in the report the verification sample taken at the leaking joint on a map and in a narrative discussion.

Page 4-27 Soil Sampling: Why wasn't Sample #11 analyzed?

Page 4-42; Soil Sampling: Cannon should submit a work Plan to NMED for the investigation of the concrete wash rack which appears to be contaminated.

Page 4-88 Unit Removal: If Sample #9 was a confirmatory sample, it should have been laboratory analyzed instead of field analyzed.

Page 4-119 Unit Removal: The waste concrete from this SWMU was not analyzed like the other SWMUs before disposal in the landfill.

Page 4-128 Soil Sampling: Samples #3 and #7 indicate contamination; however, it appears deeper samples were not taken at either location. Sample location #3 may need lateral sampling.

Page 4-146 Soil Sampling: It appears that Cannon did not take a confirmatory sample in the stained soil area around the outlet pipe at the west sandtrap.