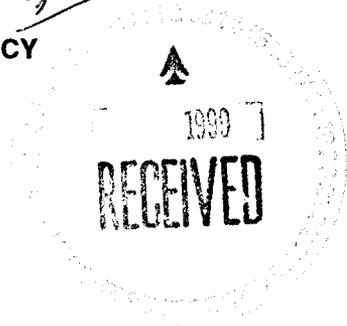




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

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JUN 7 1999

Mr. Benito J. Garcia, Chief
Hazardous and 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 Workplans for SWMUs 86-90 (site SD-11) at Cannon Air Force Base, New Mexico. The following documents were reviewed: Corrective Measures Study Work Plan, Field Sampling Plan, Quality Assurance Project Plan Addendum, and the Site Safety and health Plan Addendum.

The review resulted in 16 comments which are enclosed for your consideration in determining the adequacy of the work plans.

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

Sincerely yours,


David Neleigh, Chief
New Mexico and
Federal Facilities Section

Enclosure

cc: Carl Will
New Mexico Environment Department

EPA COMMENTS
WORK PLANS SWMUS 86-90 (SD-11)
CANNON AIR FORCE BASE
NM7572124454

CORRECTIVE MEASURES STUDY WORK PLAN

Section 3 Site Background 3.3 Previous Investigations 1984-1985 Phase II IRP Page 3-2. The report states that based on the results of the Phase II Investigation, additional soil sampling was recommended due to the limited number of borings. Briefly discuss what was found and their respective concentration levels which prompted the additional sampling.

Section 3 Site Background 3.3 Previous Investigations 1987 RFA Pages 3-2 and 3-3. The RFA also indicated that the potential for release to the soil was high due to the past disposal of hazardous wastes and the unlined nature of the SWMU. What contaminants were found and at what levels? Was TPH identified?

Section 3 Site Background 3.3 Previous Investigations 1991-18 SWMUs RI Page 3-4. Text states that periodic soil samples were taken for analysis. What were the TPH concentrations?

Section 4 CMS Objectives and Approach 4.3 Evaluation of Corrective Measures Alternatives Page 4-3. Before discussing alternatives, Cannon AFB should discuss what are the remediation goals. Compliance should be with Risk Based Corrective Action cleanup goals, and the non Risk Based NMED cleanup standards of 100 ppm for TPH.

Section 4 CMS Objectives and Approach 4.4 Preliminary Development Of Site Conceptual Exposure Models Page 4-5. Text states " The potential sources of chemical emissions from SWMUs 86-90 are presented in Figure 4-2". Figure 4-2 describes the Site Conceptual Exposure Model. This information would more likely be in table format. Please explain.

Section 4.6.2 - Derivation of EPA Region VI MSSLS (Page 4-8): The following is stated in the fourth paragraph of this section with regard to soil exposures: "For the Tier 1 assessment, residential MSSLS will be used. If a Tier II assessment is required, the site-specific exposure parameters will be refined and industrial MSSLS will be used for screening". Depending upon the projected use of this area, either residential or industrial MSSLS should be used uniformly throughout the assessment process. The practice of applying residential values in the Tier 1 assessment would constitute a conservative approach, but if the projected use of the area is industrial, the residential values

may prove excessively conservative.

Section 4.6.2 - Derivation of EPA Region VI MSSLS (Page 4-9): In the first paragraph of this page, the sentence "If the screening-level MSSLS are not expected..." should read "If the screening-level MSSLS are not exceeded..."

Section 4.7.1.2 - Assessment and Measurement Endpoints (Page 4-12): The first paragraph of this page indicates that "Upper trophic level categories would not need to be assessed, for example, if the contaminants are unlikely to biomagnify". Is biomagnification intended to be the only qualifier for assessing upper trophic level categories? Attention might also be given to whether or not the contaminants bioconcentrate. In addition, this or a more detailed CMS Objectives and Approach report should specify the "cutoff points" in determining the likelihood of biomagnification for constituents of concern.

Section 4.7.1.5 - Contaminant Fate and Transport (Page 4-13): This section states that groundwater transport and surface water runoff will be looked at as potential contaminant transport pathways, while the last paragraph of Section 4.7.1.4 mentions that soil is anticipated to be the only medium of concern at this site. Please clarify. With attention being given to groundwater transport and surface runoff, a site map and mention of the direction of groundwater flow would be a useful addition to this report.

Field Sampling Plan Section 1 Sampling Locations, Frequencies, and Analysis Page 1-1 paragraph 4. Change the third sentence to read, "Five soil samples will be collected from each boring location."

Field Sampling Plan Page 1-1 paragraph 1. "Locations of the SWMUs are shown on Figure 1-1 of the CMS Work Plan". Figure 1-1 is the regional map, Figure 1-2 is the SWMU location map.

Field Sampling Plan Page 1-1 paragraph 7. If the initial value exceeds the lowest value of detection (10 ppm to 25 ppm for TPH), then the mid level range (100 ppm to 250 ppm) will be used. NMMEDS cleanup standards are 100 ppm (diesel/waste oil) and 10/50 ppm for gas.

Field Sampling Plan Page 1-2. If the field screening results for TPH indicate detections in either of the bottom two sample intervals from any boring, then the USACE Technical Manager will be immediately notified and before the field crew demobilizes from the site. Which detection limit will be used, low level or mid level? Reference previous comment.

Field Sampling Plan Page 1-2. VOCs will be analyzed for VOCs by EPA Method 8260B. Be advised of Update III to SW-846 sample collection

technique published in the June 13, 1997 Federal Register Vol 62, No. 114, pp. 32452-463. The accuracy of this method warrants their immediate use versus traditional methods. The three alternatives are: Method 5021- Heated head space for volatile concentrations below 200 ppb. Method 5035 Heated purge and trap in the range of 5 to 200 ppb. Method 5035 Methanol extract for volatiles exceeding 200 ppb.

Field Sampling Plan Figure 1. What criteria was used to determine the proposed soil boring locations inside the concrete berm? Results of the previous soil boring locations are not discussed, and borings 11A and B1 are not shown. Borings B2/B3/B4 and B5 are shown as completed nine years ago as part of Phase IV IRP. Consider sampling outside of the berm to confirm existing conditions.

Appendix B. EPA Region 6 Human Health Media-Specific Screening Levels. Note that this document (11/7/97) is now out of date. The current document is October 1998 and can be found on the Internet <http://www.epa.gov/earthlr6/6pd/rcra-c/pd-n/r6scrval.htm>