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PETER MAGGIORE  
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**Certified Mail  
Return Receipt Requested**

February 11, 1999

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

Subject: Request for Supplemental Information:  
Corrective Measure Completion Report  
Appendix II and III Solid Waste Management Units - Oil/Water Separators  
(SWMU Nos. 1, 7, 8, 9, 11, 32a, 33b, 38, 39, 46, 47, 51, 57, 61, 62, 63, 70,  
92, 94)

Dear Colonel Clary:

The RCRA Permits Management Program (RPMP) of the New Mexico Environment Department (NMED) has reviewed the above-referenced Report, dated September, 1997, and submitted to NMED on April 29, 1998, as required under the New Mexico Hazardous Waste Management Regulations.

RPMP 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 should be submitted within 60 days of receipt of this letter.

Colonel Clary  
February 11, 1999  
Page 2

If you have any questions please contact Carl Will of my staff at 505-827-1561, ex. 1031.

Sincerely,



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

Attachment

cc: Col. James A. Thomas, III, CAFB  
Daniel A. Barnett, CAFB  
David Neleigh, EPA Region 6  
Stephen Pullen, HRMB  
Carl Will, HRMB

file: HSWA/CAFB/OWS  
track: CAFB/Clary/Dinwiddie/2-11-99/OWS CM Completion Report RSI

## ATTACHMENT

### COMMENTS ON CAFB CORRECTIVE MEASURES COMPLETION REPORT, APPENDIX II AND III SWMU'S - OIL/WATER SEPARATORS

February 11, 1999

#### General Comments

Page v, Executive Summary. Include a statement describing the Gandy Marley disposal method for soils contaminated with greater than 100 mg/kg TPH.

Page v, Executive Summary. Include a statement describing the sampling technique that was used for the concrete prior to disposal.

Page 4-2, Unit Contents, and throughout. Include a description of the sample analysis that was performed to determine whether or not sludge and liquids from the SWMU's was hazardous waste prior to disposal. The Workplan, at page 47, section 4.7, states that fluids and sludges from the units would be sampled according to CDQM for Petroleum Storage Tank Remediation Projects in Appendix E. Appendix E contents were not included in HRMB's copy of the Workplan.

Page 4-2, Unit Contents, and throughout. The Report states that sample analysis results for the sludge and liquids removed from each OWS and sandtrap are included in Appendix I. Appendix I sampling data are for soils and solids only, and appear to be duplicates of soil sampling results in Appendix IV, Laboratory Analysis Results for Soils. Explain the discrepancy. Include sampling results for the SWMU contents in the Report.

Page 4-4, Table 4.1-1, page 4-7, Table 4.1-3, and throughout. The Workplan, Appendix II and III Solid Waste Management Units, dated April, 1996, at sections 3.11.1.4. and 4.3.1.9., states that analysis for total RCRA metals would be performed at the bottom of each excavation. The Summary Soil Sample Results Tables indicate that only TCLP metals were sampled. Include total metals results in all Summary Soil Sample Results Tables.

Page 4-7, Table 4.1-3, and throughout. The Workplan approval issued by HRMB on April 22, 1997, stipulated that analysis for chromium would be valence specific for chromium VI. The Report does not indicate that this was done. Explain the discrepancy.

Appendices. Include laboratory analysis results for each duplicate of samples submitted for laboratory analysis to correlate field findings.

Appendices. Laboratory analysis results for soils in Appendix IV appears to not include SWMU's 1, 7, 11, 38, and 63. Include those results if missing.

#### **4.1. Appendix II SWMU's**

##### **4.1.1. SWMU 1**

###### **Soil Sampling**

Page 4-3. Sample locations 2 and 4 were collected from the east and west walls two feet below the top of the unit, which is described as an inch below the soil level. Sample information in Volume 2 lists these samples as taken from a depth of 11 feet bgs. Explain the discrepancy.

###### **Risk Evaluation**

Page 4-7, Table 4.1-3. The Region 6 Residential RBSL values in the table for barium, nickel, and lead are an order of magnitude lower than what they should be. For example, the RBSL for lead is 400 mg/kg, not 40 mg/kg.

##### **4.1.2. SWMU 7**

###### **Soil Sampling**

Page 4-10. Provide further explanation of why sample #8 was considered not representative of the excavated material. Provide an explanation if the analytical results were believed to be in error. Identify whether or not samples #8 and #10 were composite samples. If known, provide information on the location of sample #8 relative to sample #10 and to the location of soil prior to removal.

##### **4.1.4. SWMU 9**

###### **Soil Sampling**

Page 4-26. Identify in the Report, on a map and in a narrative discussion, the verification sample taken at the leaking joint.

Page 4-27. Include an explanation of why sample #11 was not analyzed.

##### **4.1.6. SWMU 32A**

###### **Soil Sampling**

Page 4-42. Submit to HRMB a SWMU Assessment Report and investigation of the newly-discovered release, in accordance with Module IV, Sections E. and F., of CAFB's RCRA Permit, for the soil contamination under the adjacent concrete

washrack and resulting from runoff from the clogged drain and surface contour.

#### **4.1.7. SWMU 33b**

The divider for this section is labelled "32B." Submit a divider with the correct tab label.

#### **Unit Contents**

Page 4-48. As stated in the general comments, include the sample results indicating the possibility of high lead.

#### **4.2. Appendix III SWMU's**

##### **4.2.3. SWMU 51**

#### **Soil Sampling**

Page 4-88. Sample 5 field sampling analysis should have led to additional sampling or soil removal. The Workplan, at sections 3.5.3., 3.6.2.8., and 4.3.1.5., states that vertical and lateral extent of contamination would be determined by completing borings to detections less than PRG's of 100 ppm TPH and 50 ppm BTEX, and that soil with field detections of greater than 100 ppm TPH would be excavated. The levels of TPH detected are not addressed in the risk analysis section.

##### **4.2.5. SWMU 61**

#### **Soil Sampling**

Page 4-106. Explain why field sampling analysis did not include BTEX.

##### **4.2.6. SWMU 62**

#### **Soil Sampling**

Page 4-113. Explain why field sampling analysis did not include BTEX.

##### **4.2.7. SWMU 63**

#### **Unit Removal**

Page 4-119. The Report does not state that the concrete was analyzed prior to disposal.

#### **Soil Sampling**

Page 4-127. Explain why field sampling analysis did not include BTEX.

#### **4.2.8. SWMU 70**

##### **Soil Sampling**

Page 4-129. Table 4.2-15 shows that field analysis results detected BTEX greater than 300 mg/kg. Explain why these sample results did not result in further sample analysis or soil removal. These detections are not discussed in the text.

#### **4.2.9. SWMU 92**

##### **Unit Description**

Page 4-136. Include an explanation of what was the source of discharge into this OWS, for example by explaining what is a Power Check Pad.