



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 27th SUPPORT GROUP (ACC)
CANNON AIR FORCE BASE NEW MEXICO



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Colonel James A. Thomas III
Commander
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
P O Box 26110
Santa Fe NM 87502

Dear Mr. Garcia

Enclosed for your review and approval is the Cannon AFB response to your 11 Feb 99 Request for Supplemental Information on the Corrective Measure Completion Report for Appendix II and III Solid Waste Management Units.

If you have any questions, please contact Mr. Sanford Hutsell of my environmental flight at (505) 784-6378.

Sincerely

James A. Thomas III
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)
EPA Region VI (B. Sturdivant)
HQ ACC CEVR (R. Kemmether)

**RESPONSE TO NMED COMMENTS
CAFB CORRECTIVE MEASURES COMPLETION REPORT
APPENDIX II AND III SWMU'S – OIL/WATER SEPARATORS**

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.

Response: Cannon AFB will comply with request and enter the following statement into the revised report: *Gandy Marley remediates soil by landfarming techniques. Remediation is accomplished by spreading out the soil in six-inch lifts in a five-acre area or less and disking it every two weeks until soil samples prove the soil is below State of NM regulatory limits. Gandy Marley is a NMED permitted landfarm facility.*

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

Response: Cannon AFB will comply with the request and enter the following statement into the revised report: *Prior to disposal, composite samples of concrete chips from the interior floor of the OWS were analyzed by ASTM methods 8260, 8270, and TCLP for metals.*

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 DCQM for Petroleum Storage Tank Remediation Projects in Appendix E. Appendix E contents were not included in HRMB's copy of the Workplan.

Response: Cannon AFB will comply with the request and enter the following information into the revised report: *Unit contents were analyzed for SW-846 methods 8260 Volatiles, 8270 Semi-Volatiles, TCLP extracted 8 RCRA metals, pH, Ignitability, and Reactivity-Cyanide, TPH and Sulfide. Appendix E contents will be added.*

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.

Response: Sampling results and Waste Profiles will be included in Appendix I of the revised report. Clerical error resulted in the discrepancy.

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 Unit, 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.

Response: Total Metals were also analyzed for at the bottom of each excavation. The results can be found in Appendix IV.

Page 4-7, Table 4.1-3, and throughout: The Work plan 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.

Response: Total Chromium was analyzed at each location. A conservative assumption was then made that all the Chromium detected would be handled as Chromium VI. Based on the Total Chromium results none of the sites tested would exceed the 31 mg/Kg risk based screening level adopted by EPA Region VI.

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

Response: Results for duplicates will be included in Appendix IV.

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

Response: Missing results will be included into Appendix IV of the revised report.

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.

Response: Samples 2 and 4 were both taken 11 feet bgs, which is 2 feet below the floor of the OWS slab that was left in place. Clarification will be made to the revised report.

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 m, not 40 mg/kg.

Response: Cannon AFB concurs. Table will be changed to meet EPA Region VI specifications in the revised report.

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.

Response: Sample number 8 was taken from a single hot location in the stockpile and was not a composite sample. Confirmatory samples from the sides and bottom of the excavation showed no detectable contamination. Sample number 10 was a composite sample of the excavated soil. Information will be added to the revised report for clarification.

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.

Response: Cannon AFB will concur and information will be inserted into the revised report.

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

Response: Sample #11 was a split sample for the government QA, but not analyzed due to funding constraints. A QA sample was taken at a later date. Information detailing the action will be included into the revised report.

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, Section 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.

Response: The adjacent washrack is identified in the Cannon AFB RCRA Permit as SWMU 31. No SWMU assessment is necessary as the site was previously identified and assessed in the base-wide RCRA Facility Assessment. The site will undergo further evaluation to determine the nature and extent of contamination, however, the location is currently industrially active. Previous RCRA Facility Investigations have shown limited contamination which will need to be addressed in the future. Cannon AFB will program further investigation for SWMU 31. SWMU 32A, while adjacent to SWMU 31, is a separate site.

4.1.7 SWMU 33b

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

Response: Cannon AFB will concur.

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

Response: Concur-Sample results for the OWS contents will be included in Appendix I of revised report.