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



June 21, 1999

Mr. Carl Will
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo Street
P.O. Box 26110
Santa Fe, NM 87502

Dear Mr. Will:

The Environmental Protection Agency (EPA) has completed a review of the Cannon Air Force Base Response To Comments for the Corrective Measures Study Work Plan at SWMUs 86-90 (Site SD-11). This review is a result of our telephone conversation on June 2, 1999. The enclosed response is intended to clarify EPA's original group of comments dated January 7, 1999.

If you have any questions, please contact me at (214) 665-7440.

Sincerely,

Bob Sturdivant
New Mexico and Federal
Facilities Section

Enclosure

cc: James P. Bearzi
New Mexico Environment Department

EPA REVIEW
RESPONSE TO COMMENTS
CORRECTIVE MEASURES STUDY WORK PLAN SWMUS 86/90
CANNON AIR FORCE BASE

General Comment: Reference Mr. Robert P. Dinwiddies letter to Colonel Koerner dated September 19, 1997, in which he directs that all comments be addressed in the Corrective Measures Report when submitted. Mr. Dinwiddies letter to Colonel Clary dated February 25, 1999 is a request for supplemental information necessary to complete the Work Plan review. This letter supplements the guidance given in the September 19, 1997 letter to Colonel Koerner. It is not understood why the responses to comments 1 and 2 were "comment noted".

Comment #5a: Reference the General Comment. Delineation of the horizontal extent of contamination should be addressed as requested. The Scope Of Work for a CMS should include updated information describing the current situation at the facility, and the known nature and extent of contamination.

Comment #5e: EPA's comment #3 also states that "Compliance should be with Risk Based Corrective Action cleanup goals, and the Non- Risk Based NMED cleanup standards. This sentence was not included in the NMED comment. Cannons response states that they will use the RBCA process.

Comment 6c: 2000 mg/kg is the correct Industrial Soil MSSL for lead. It should be used as the Tier 2 concentration in the CMS unless modified by NMED Standards.