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Reading File mailed Cannon AFB

February 11, 2000

Lt Colonel Eric J. Wilbur
Commander
Department of the Air Force
27th Civil Engineer Squadron (ACC)
506 N DL Ingram Blvd
Cannon AFB NM 88103-5136

RE: *Corrective Measures Study Work Plan*
SWMU 101 - Sewage Lagoons
Cannon Air Force Base
EPA ID No.: NM7572124454

Dear Lt Colonel Wilbur:

The Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department has reviewed Cannon Air Force Base's *Corrective Measures Study Work Plan*, submitted under cover received January 11, 2000. Thank you for submitting this work plan for HRMB's review.

After reviewing this work plan, HRMB feels that the tasks specified in this work plan do not match those specified for a Corrective Measures Study (CMS) in Cannon's 1989 HSWA Permit (see Module IV, Section R). More recent CMS guidance is provided in EPA's 1994 RCRA *Corrective Action Plan* (see especially Chapter IV - *Corrective Measures Study*). The field tasks specified in Cannon's proposed work plan appear to be in support of additional contamination characterization and final closure or stabilization of the two impoundments, rather than corrective measures. Closure of the two impoundments may be included in the final corrective measures.

Given that the field work consists primarily of data collection, Cannon should proceed "at risk" with this part of their RCRA Facility Investigation (RFI). The results of the proposed field work and conclusions based on this data and previously collected

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data should be submitted as an Addendum to Cannon's 1992 RFI Report (*Remedial Investigation Report for 18 Solid Waste Management Units, Oct. 19, 1992*).

The RFI Report addendum should include a risk assessment based on the new data, as well as previously collected data, to determine whether any releases pose unacceptable risk to either human health or the environment. This risk assessment may be incorporated in a Final RFI Report, an interim corrective measures, or a Corrective Measures Study for this particular SWMU.

Although HRMB did not review Cannon's "Corrective Measures Work Plan" in detail, we did note several general problems with this work plan.

Comment 1. Cannon states in § 1.0 that "The CMS for SWMU 101 is a voluntary program" and in § 3.1 makes a similar statement. HRMB wishes to remind Cannon that the RFI and CMS for SWMU 101 is required pursuant to Cannon's 1989 HSWA Permit (see Module IV, Sections G through N) and, therefore, is not a "voluntary program."

Comment 2. Cannon also states in § 1.0 that although the CMS is being conducted under the provisions of RCRA, the requirements of CERCLA apply. HRMB believes that earlier RFI documents submitted by Cannon more accurately depict the RCRA/CERCLA relationship at Cannon (for example, see Cannon's *Executive Summary to Appendix II - RCRA Facility Investigation - RFI Report*).

HRMB is sensitive to the issue of overlapping RCRA and CERCLA authorities and the similar, although not identical requirements of each program. In the interests of expediting the review and approval process and minimizing duplicative work, HRMB recommends that Cannon adhere as closely as possible to RCRA guidance when submitting RFI work plans, RFI reports, CMS work plans, and CMS reports, pursuant to Cannon's 1989 HSWA permit.

If Cannon wishes to submit site investigation and remediation related documents prepared in accordance with CERCLA guidance rather than RCRA guidance, then HRMB suggests that at a minimum, Cannon should provide a table that compares and discusses both RCRA and CERCLA requirements and guidance to facilitate our review. However, Module IV, Sections Q and R of the 1989 HSWA Permit specify Scopes of Work for RFIs and CMSs; Cannon should adhere to the requirements specified in these permit conditions.

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Comment 3. Cannon's statement concerning the purpose of a CMS is inconsistent with CMS guidance. A CMS is required whenever a release has been identified. Cannon's work plan does not specify whether a release has been confirmed at SWMU 101, much less characterize the extent of a release. Please refer to Chapter IV, page 55 of EPA's CMS guidance (*RCRA Corrective Action Plan (Final)*, OSWER Directive 9902.3-2A, May 1994).

Comment 4. In § 2.2 Cannon states that ". . . SWMU 101 was not covered under the Base's Part B Permit. . . ." HRMB reminds Cannon that SWMU 101 was specified in Appendix I to their 1989 HSWA Permit. Therefore, a RFI and CMS, if appropriate, is required pursuant to Cannon's 1989 HSWA permit.

Comment 5. In your cover letter to this work plan, Cannon indicates that you plan to commence fieldwork in March 2000. In the future, please allow adequate time for regulatory review.

As noted above, HRMB has not reviewed this document in detail; however, in general the work described in this work plan appears technically sound, and HRMB recommends that Cannon implement this work plan "at risk". If you have any questions concerning this review, please call me at 505-827-1558 (extension 1024).

Sincerely,



Glenn von Gonten,
Geologist III

Tracking: HRMB CAFB-99-014

cc: Daniel A. Barnett, Cannon Air Force Base
John S. Pike, Cannon Air Force Base
David Neleigh, EPA Region 6
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