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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
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JAN 02 2001



Mr. James Bearzi, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2044 Galisteo Street
P.O. Box 26110
Santa Fe, NM 87502

Glenn

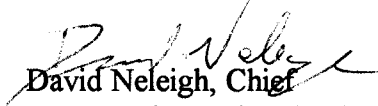
Dear Mr. Bearzi:

The Environmental Protection Agency has completed a review of the document titled "Hazardous and Solid Waste Amendments/Corrective Action Related Permit Modification Request No Further Action Proposals" dated July 2000.

The review resulted in twenty six comments that should be addressed. The NMED may wish to combine these comments with their concerns for a single response from Cannon Air Force Base.

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

Sincerely,


David Neleigh, Chief
New Mexico and Federal Facilities
Section

Enclosure

cc: Mr. Glenn von Gonten, NMED

EPA COMMENTS
CANNON AIR FORCE BASE NO FURTHER ACTION PROPOSALS
CLASS 3 PERMIT MODIFICATION REQUEST

It appears that both Region 3 Risk Based Concentration Tables (RBCs) and Region 6 Medium Specific Screening Levels (MSSLs) were used as screening criteria in the SWMU evaluations. Region 3 RBCs were the screening criteria for human health risks, and Region 6 MSSLs were the basis for risk evaluations.

Region 3 Risk Based Concentration Tables (RBCs) were used as a screening assessment tool for most of the SWMUs. Region 3 RBC Tables address soil ingestion pathways only. Inhalation and dermal pathways are not listed so that some Chemicals of Concern (COCs) may have been omitted from the limited Risk Assessments. Since 1988, EPA Region 6 Human Health Medium Specific Screening Tables have been available, and current tables should be used for future assessments.

SPECIFIC COMMENTS

Section 4 SWMU 113, Landfill 5: Paragraph 4.4.2.4 Results and Conclusions. Text states that the VOC trichlorofluoromethane is a common laboratory contaminant. Section 4.4.4.2 Sampling Data Collection lists this as a refrigerant or blowing agent. Please clarify.

Section 7 SWMU 9, Aircraft Washrack Drain System Paragraph 7.1. Summary states that the Corrective Measures Completion Report (USACE 1999) documents the removal of this system, however, Paragraph 7.5.1 Nature and Extent of Contamination documents a partial removal the system. Clarify if this was a total or partial removal.

Section 10 SWMU 11, OWS 3 170 Paragraph 10.1. Summary states that the USACE 1999 Corrective Measures Completion Report documents the removal of OWS # 170, however, Paragraph 10.5.1 Nature and Extent of Contamination reports a partial removal of this OWS. Was this a partial or total removal?

Section 13 SWMU 46 OWS # 196 Section 13.6.2.1. Screening Assessment Human Health page 13-5. When was the Phase I RFI Screening done? Region 3 RBCs were used for residential soil. Region 6 RBCs address ingestion, inhalation, and dermal pathways.

Section 22 SWMU 2 Recovered Diesel Tank # 108. Even though this SWMU was "misidentified", a 2000 gallon heating oil UST was removed in 1989. Were any confirmatory soil samples taken?

Section 24 SWMU 4 Recovered Oil Tank 3 121. Text states that a 2000 gallon heating oil UST was removed from this site. A NMED UST Program was ongoing in 1989. Was confirmatory sampling done? Results?

Section 45 SD-11 Engine Test Cell Area SWMUs 86 - 90. Section 45.2.1. Figures 45-1, 3, and

4 show only SWMUs 86 and 89. SWMU 88, a former leach field was converted to an evaporation pond (SWMU 89). SWMUs 87 and 90 should be shown on these figures.

Appendix B Table 45-3a Pages B-8 and B-10. Analytical results show TPH concentrations ranging from non-detect to 5270 ppm. Several samples exceed NMEDs UST regulatory cleanup level. Please explain.

Subsection 45.5.2 Environmental Fate. "Based on model results, the initial leachate concentration for benzo(a)pyrene was calculated to be 0.00066 mg/L. Multiplying this concentration by an attenuation factor of 3,700 yielded a predicted concentration at the bottom of the vadose zone of 1.8×10^{-7} . The product of multiplication should be 2.442. The quotient of the leachate concentration divided by 3,700 equals 1.8×10^{-7} .

The last paragraph in this subsection states that biodegradation would be expected to reduce the concentration at the bottom of the vadose zone to 0.0. What would be the projected timeframe for this to occur?

Subsection 45.6.4.3 USTs. Were confirmatory samples taken when the tank was removed in 1994? Results?

Section 46 SWMU 91 Recovered Fuel Tank 5114 Subsection 46.1 Summary. Although this was not a SWMU by definition, JP- 4 jet fuel was stored in the AST. Was there any visual inspection of the soil under the AST for contamination from leakage?

Section 48 SWMU 95 Northeast Stormwater Drainage Area Subsection 48.4.2.2 Sampling Date Collection. 11 soil borings were completed and sampled, however, only 7 borings are shown on Figure 48-1.

Section 49 SWMU 96 Old Entomology Rinse Area Subsection 49.4.2.2. Text states that 3 borings were drilled. Analytical results from 17A and 17C are listed in Table 49-1. Where are the results from Boring 17B and B2?

Subsection 49.4.2.4 Results and Conclusions: The highest concentration of 2,4-D was collected from a sample depth of 61.5 to 62.0 feet. Table 49-1 (Appendix B) shows the highest concentration of 2,4-D (3,410 ppm) was found in Boring 17A at 62.5 to 63.0 feet.

Section 50 SWMU 98 Sanitary Sewer Line Subsection 50.4.2.4 Results and Conclusions. Text states that analytical results are presented in Table 50-1 (Appendix B), but the Table lists only metal data. What are the VOC and TPH concentrations?

Section 51 SWMU 104 Landfill No. 4 Subsection 51.6.2.1 Human Health. The maximum concentration of chemicals detected in the five ground water samples were compared to the applicable EPA MCLs. None of the compounds with established MCLs exceeded the corresponding MCL. Table 51-2b shows bis(2-Ethylhexyl)phthalate concentrations of two ground water samples (51 and 59 ppb) exceeds the MCL for that chemical (10 ppb). This was not addressed in the Human Health Risk Assessment.

Section 52 SWMU 105 Landfill No 3 Subsection 52.4.4.3 Results and Conclusions. Analytical results are presented in Table 52-2a and 52-2b instead of 52-1a and 52-1b. Typo error.

Section 54 SWMU 107 Fire Department Training Area No.3 Subsection 54.4.2.4 Results and Conclusions. Benzene and toluene were not detected in any of the samples above the quantitation limits. The quantitation limits that were used varied from 2700 ppb to 36000 ppb for some samples, and 11 ppb for other samples. If the benzene concentration in one of the samples was 3000 ppb, and the quantitation limit is 36000 ppb, the result could be non-detect, however, it does not mean that benzene does not exist in that sample. 3000 ppb of benzene exceeds EPA Region 6 MSSSLs which is 1400 ppb for an industrial use scenario. The locations where the results exceeded the MSSSLs should be resampled.

Appendix B Table 54-1b. The highest TPH concentration is 6,080 ppm for surface samples, and 18,300 ppm for subsurface samples. These values are above NMEDs Standards for TPH. Corrective action should be taken for TPH at this site.

Appendix B Table 54-1b. Data from Boring 1075 indicates a possible "hot spot". From Figure 54-1, Boring 1075 is situated in a lower elevation. Subsection 54.1 Summary. Text states that during fire training exercises, the ground was saturated with water, then unused jet fuel (JP-4) was introduced and ignited for training purposes. Residual / unburned fuel could flow down gradient and accumulate at a lower elevation. The contamination may not be fully delineated at this site.

Section 56 SWMU 125 Inactive Underground Storage Tank. No evidence indicates that this tank was used for waste storage, however, it was used to store something. The existence or removal of this UST could be verified by a GPR sweep. Could it have been abandoned in place with an unknown substance in it?

Section 58 SWMU 127 Sand trap and Leach Field for Facility 4095. What is the significance of the column titled Robin Benchmark Dietary Level in Table 58-2b Page 2? This would be used in an ecological assessment. Subsection 58.6.2.2 Ecological states that a formal ecological risk assessment was not warranted. Please explain.

Subsection 58.4.3.4 Results and Conclusions. Table 58-2c A Summary of Human Health Risks at SWMU 127 is not in Appendix B.

Subsection 58.4.4.4. TRPH of 11,600 ppm exceeds NMEDs action level of 1000 ppm. Why was no Corrective Action taken?