



September 27, 2011

Ms. Karen Walker
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Subject: Errata Pages for the Phase II Supplemental Assessment at Area of Concern A (SS-19)
Project Activities Work Plan Addendum
Cannon Air Force Base (AFB), New Mexico

Ms. Walker:

Enclosed is one copy of the errata pages (with instructions) for the Project Activities Work Plan (PAWP) Addendum for the Phase II Supplemental Assessment at Area of Concern A (SS-19) at Cannon Air Force Base (AFB). These errata pages incorporate changes based on comments provided by New Mexico Environment Department (NMED). These errata pages advance the document to Final status. A copy of the Response to Comments (RTCs) is also enclosed.

Please call if you have any questions.

Sincerely,

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Technical Manager
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Enclosures: Errata pages, errata page instructions, and RTC document for the Phase II Supplemental Assessment at Area of Concern A (SS-19) Project Activities Work Plan Addendum (1 hard copy and 1 CD)

cc: Ms. Anita Lafuente, Cannon AFB, 27 SOCES/CEAN (2 hard copies and 2 CDs for Cannon AFB, and 2 hard copies and 2 CDs [without Health and Safety components] for transmittal to NMED)

Mr. Eliud Burgos, AFCEE/EXEE (1 hard copy and 1 CD)

RESPONSE TO COMMENTS
PHASE II SUPPLEMENTAL ASSESSMENT AT AREA OF CONCERN A (SS-19)
PROJECT ACTIVITIES WORK PLAN ADDENDUM
EPA ID NO. NM7572124454
HWB-CAFB-11-002
CANNON AIR FORCE BASE, NEW MEXICO

Comments by John E. Kieling, Acting Chief, Hazardous Waste Bureau, New Mexico Environment Department, dated August 26, 2011.

Comment 1. Section 1.5, Data Quality Objectives, second paragraph, last sentence, page 1-4: Permittee's Statement: "A maximum chemical concentration that exceeds an [soil screening levels] SSL does not mean that a health risk exists because the maximum concentration detected is not the concentration to which people would routinely be exposed, and the exposure assumptions used to derive the SSLs are not site-specific."

NMED Comment: While the Permittee's statement is true, it should be pointed out that the Permittee does not necessarily have to use maximum contaminant concentrations to evaluate human health and ecological risks. If five or more samples are collected for analysis of a contaminant, it may be possible to calculate an upper confidence level (UCL) of the arithmetic mean concentration for a constituent and the UCL may be used as the exposure point concentration (EPC) for that constituent. If an appropriate UCL cannot be calculated or if the calculated UCL exceeds the maximum detected concentration (or the maximum constituent detection limit), the maximum detected concentration must be used. The United States Environmental Protection Agency (EPA) has developed a program (ProUCL 4.00.05) to calculate the 95 percent (%), 97.5%, and 99% UCL and to recommend a distribution and UCL based on the distribution of a given data set. The ProUCL program is based on EPA guidance. This information is provided for the Permittee's future use.

Response: Agree. This methodology may be used to calculate a UCL for this project or for other projects in the future. A new paragraph will be inserted after the fifth paragraph of Section 1.5 as follows: "*If the maximum lead concentration present in the soil samples exceeds the SSL or ESL, then an upper confidence level (UCL) may be calculated. A UCL of the arithmetic mean concentration for a constituent and the UCL may be used as the exposure point concentration (EPC) for that constituent. If an appropriate UCL cannot be calculated or if the calculated UCL exceeds the maximum detected concentration (or the maximum constituent detection limit), the maximum detected concentration will be used.*" Additionally, the acronym list will be updated to include EPC and UCL.

Comment 2. Section 1.5, Data Quality Objectives, third paragraph, page 1-4: Permittee's Statement: "NMED SSLs for soil exposures are based on the ingestion, inhalation, and dermal exposure routes. SSLs are available for industrial and residential scenarios. [Area of Concern] AOC A is located in industrialized areas of the base; therefore, the industrial SSLs for lead (8.00E+02 [milligrams per kilogram] mg/kg) will be used for screening at this site."

NMED Comment: NMED agrees that AOC A is in an industrial area of the base. In order to be considered for a Corrective Action Complete without controls determination, all AOC A constituents must be present at concentrations less than the corresponding residential SSL. Screening must evaluate lead results for both scenarios in the future Investigation Report for the Phase II Supplemental Assessment at Area of Concern A (SS-19)

Response: Agree. The industrial SSL for lead was inadvertently cited. The residential SSL (cited in Table 1-3 and Appendix A [pages 15-1 and 17-1]) will be used as a screening value for this site. The text in Section 1.5, third paragraph, third sentence will be revised as follows: *“Although AOC A is located in industrialized areas of the base; therefore, the industrial residential SSLs for lead (~~8.00E+02 mg/kg~~) (4.00E+02 mg/kg) will be used for screening at this site. The residential SSL will be used in order to allow the site to be considered for Corrective Action Complete without controls determination.”*

Comment 3. Section 5.3, Phase II Supplemental Assessment at AOC A (SS-19) Report, page 5-1, first bulleted item:

NMED Comment: Do not include copies of digging permits in NMED's copy(s) of the report.

Response: Agree. Copies of digging permits will not be included in NMED's copy(s) of the report. No changes to the report are recommended.

Comment 4. Appendix A, Table 12-2, Calibration and [quality control] QC Procedures for [United States Environmental Protection Agency] USEPA Method SW 6010B Phase II Supplemental Assessment at AOC A (SS-19), page 12-4:

NMED Comments: For the Permittee's information, the current version of the Inductively Coupled Plasma-Atomic Emission Spectrometry analytical method is 6010C. The spacing of the table row for initial calibration (page 12-4) is insufficient to display all of the information associated with the QC Check column. Provide a revised page 12-4 that displays all of the QC Check information by no later than September 30, 2011. In the event wider row spacing results in pagination changes to other pages of the table, provide a revised Table 12-2 that includes the information contained on current pages 12-3 through 12-7.

Response: Agree. The heading for Table 12-2 will be revised as follows: **“CALIBRATION AND QC PROCEDURES FOR USEPA METHOD SW6010BC”**

The row height for initial calibration (page 12-4) will be increased in order to display all information associated with the QC Check column. The revised Table 12-2 will be submitted.

Comment 5. SOP No.1, Section 1.2.4.2, Duplicate Samples, page 1-4:

NMED Comment: Since lead will be the only element analyzed, the Permittee must thoroughly mix the sample aliquot(s) slated for duplicate sampling. Homogenize the aliquot in a clean stainless-steel bowl.

Response: Agree. As stated in SOP No. 1, fourth sentence of Section 1.2.4.2, the duplicate sample will be handled in the same manner as the primary sample (i.e., thoroughly mixing the soil in a stainless steel bowl). Text will be added to SOP No. 1, at

the end of the fourth paragraph, to reference the soil sampling procedures in Section 1.2.3.3. The text at the end of the fourth sentence in Section 1.2.4.2 of SOP No. 1 will be revised as follows: "...primary sample (*i.e., surface soil sampling procedures in **Section 1.2.3.3** will be followed*).