January 25, 1993

Mr. Howard E. Moffitt
Deputy Base Civil Engineer
49 CES/CEV
550 Tabosa Ave.
Holloman Air Force Base, NM 88330-8458

Dear Mr. Moffitt:

The New Mexico Environment Department has reviewed the Draft Final CMS Plan for IRP sites 2&5, 8, and 14, dated November 1992. We offer the following comments.

The Remedial Action Objective proposed on page 3-8, a maximum acceptable cumulative risk from exposure to multiple carcinogenic contaminants of 1E-4 (one expected additional cancer death per 10,000 exposed persons), should provide for a maximum cumulative risk of 1E-5, or one expected additional cancer death per 100,000 exposed persons. This is the level found in section 1-101 UU of the New Mexico Water Quality Control Commission regulations, regarding "toxic pollutants".

Table 1 (page ES-3) and Tables 4-4 and 4-5 (pages 4-12 and 4-17), propose different Remedial Action Objectives for DDD, DDE, and DDT at Sites 8 and 14. The reason for the differing levels is not clear. The levels proposed for Site 8, 4.0 and 3.3 mg/kg for DDD and DDE respectively, are greater than the benchmark levels given in the Superfund Chemical Data Matrix (and used in the proposed RCRA Subpart S regulations), which are 2.4 and 1.7 mg/kg respectively. The benchmark levels are based on 1E-6 cancer risk levels. Based on available information, we believe the RAOs at both sites should not exceed the Superfund Matrix benchmark/Subpart S levels.

We concur with the stated RAO of 1000 mg/kg total petroleum hydrocarbons in soil, so long as no RCRA hazardous constituents are present for which risk-based cleanup levels would be more stringent. The CMS should incorporate adequate sampling to ensure this.

We also concur with the statement on page 3-1 that ground water remediation is not a required remedial action objective, unless a situation should arise where a receptor exists for the contaminants in the water.

Sincerely,

David Morgan
Environmental Specialist, DSMOA
Ground Water Protection and Remediation Bureau

c: Benito J. Garcia, NMED HRMB
Richard Mayer, EPA Region 6