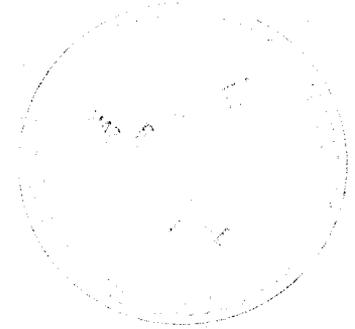




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

FEB 05 1997



Mr. Benito J. Garcia, Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044A Galisteo Street
P.O. Box 26110
Santa Fe, NM 87502

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has completed a review of the Draft RFI Phase I Report for Melrose Air Force Range. The report addresses the findings from the investigation of three Solid Waste Management Units and four Areas of Concern.

The EPA believes that the enclosed comments should be addressed before approval of the report by the New Mexico Environment Department. Please provide to EPA a copy of the entire comments sent to Melrose Air Force Range.

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

Sincerely yours,


David W. Neleigh, Chief
New Mexico and Federal
Facilities Section

Enclosure

COMMENTS

Draft RFI Report Phase I Melrose Air Force Range, N.M.

GENERAL COMMENTS

1. The word Report should be added to the title of this document.
2. SWMUs 114, 115, and 117 are suspected or known receptors of unexploded ordnance. Although explosives were apparently non-detect, there is no discussion of the method used for analysis, results, etc.
3. The future land use should be determined prior to establishing soil cleanup levels.

SPECIFIC COMMENTS

1. Executive Summary: No organic analytes were detected at concentrations above PQLs in the ground water. The Table of PQLs should be included.
2. Section 4.1.1. Development of Background Data Set. How many or what percentage of the upper extreme statistical outliers were identified and removed from the data set?
3. Section 5.3.1. Site Conceptual Model. Asbestos may also be a suspect at this burial site.
4. Section 5.3.2.4. Ground water sampling: Although the 4 monitor wells have not been sampled yet (October 96), the low flow purging method used at SWMU 114 wells should be used to minimize turbidity in unfiltered samples.
5. Section 6.1. For compounds without toxicological information, a surrogate compound is recommended to be used instead of eliminating the compound from the COC list.
6. The analytes in ground water which exceed the RBC levels; barium, beryllium, chromium and thallium, should be included in the COC selection.

The detection of metals, anions, and organics in ground water samples are compared to MCLs. Background ground water concentrations would be a better tool for evaluating statistical significant departures.

7. Section 6.3. Toxicity Assessment. Typo error. Cancer Slope Factor should be CSF.
8. Section 6.4. Risk Characterization. Recommend quantitative risk computation for total carcinogenic and non-carcinogenic risks at the site.