



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
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DALLAS, TX 75202-2733

FEB 28 1997



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

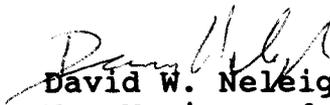
Dear Mr. Garcia:

The enclosed comments for the Draft RFI Phase I Report for Melrose Air Force Range have been revised to include the basis for each comment. The original comments were sent from the Environmental Protection Agency on February 7, 1997.

The comments have not been changed, only the information indicating the reason for the comments has been added to the document.

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. (Best Professional Judgement)
3. The future land use should be determined prior to establishing soil cleanup levels. (Best Professional Judgement)

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. (Best Professional Judgement)
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? (Risk Assessor comment)
3. Section 5.3.1. Site Conceptual Model. Asbestos may also be a suspect at this burial site. (Best Professional Judgement)
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. (Best Professional Judgement)
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. (Risk Assessor comment)
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. (Risk Assessor comment)

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. (Risk Assessor comment)