



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

MAY 08 2003

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



Re: RCRA Facility Investigation Report Addendum
Melrose Air Force Bombing Range NM

Dear Mr. Bearzi:

The Environmental Protection Agency (EPA) has completed a review of the referenced document dated February, 2003. The enclosed comments were taken from Section 5 (Ecological Risk Assessment Summary), Appendix B (Screening Level Ecological Risk Assessment), and associated figures and tables.

If you have any questions, contact me at (214) 665-7440, or sturdivant.bob@epa.gov.

Regards,

A handwritten signature in cursive script that reads "Bob Sturdivant".

Bob Sturdivant
New Mexico and
Federal Facilities Section

Enclosure

cc: Glenn von Gonten (NMED)

EPA COMMENTS
RFI Report Addendum Melrose Air Force Range NM
EPA ID NM5572124456

1.) Appendix B, Section B3 - Conclusions (page B-53): - This paragraph notes that potential risk exists for multiple trophic level species due to COPECs present at SWMUs 114, 115, 177 and AOCs -1, -2, -3,-4. Is this meant to imply that further analysis of ecological risk must be conducted at these sites? Since the activity conducted was a Screening Level Ecological Risk Assessment, the existence of potential risk would suggest the need for more site-specific analysis.

2.) Section 5.5 - SLERA Summary (page 5-11, second paragraph): - It is stated that the pH of soil at Melrose will limit the bioavailability of aluminum to plants. This explanation is used throughout Section 5 and Appendix B to suggest that concentrations/doses to receptors are exaggerated throughout the food chain, resulting in artificially high ESQ estimates. The assumption is made that there is a significant enough decrease in bioavailability to discount the significance of elevated ESQs. Please provide explanation/information as to the extent of decreasing bioavailability.

3.) Section 5.5 - SLERA Summary (page 5-11, third paragraph): - The suggestion is made that elevated iron ESQs are misleading, because the trivalent iron, "the most common form of iron in typical soils", is not bioavailable. Please provide explanation/information as to the ratios of various forms of iron in soils similar to those at Melrose, as well as information on the bioavailability of the various forms.

4.) Appendix B, Section B2.1.4.2 - Identification of Measurement Receptors for Guilds (page B-7): - Measurement receptors are established in this section, and no mention is made of representing carnivorous mammals or omnivorous birds. Is this due to perceived redundancy with other receptors, or no representative species onsite?