



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200

DALLAS, TEXAS 75202

June 27, 1989



Mr. Boyd Hamilton
Program Manager Hazardous Waste Program
Environmental Improvement Division
New Mexico Health and Environment Department
1190 St. Francis Drive
Santa Fe, New Mexico 87503

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RE: Cannon Air Force Base CME
Clovis, New Mexico
NM7572124454

Dear Mr. Hamilton:

Your letter dated June 7, 1989, recommended the inclusion of an additional regulatory violation to be issued to Cannon AFB as a result of the EPA-lead CME. The additional violation concerns the collection of samples which may not be representative of the ground water in the uppermost aquifer as required by HWMR-5, Section 206.C.1.b.(1) (40 CFR §265.91(a)). The New Mexico Environmental Improvement Division (NMEID) notes that the agitation and aeration caused by Cannon's use of submersible pumps to collect the samples may prevent representative analysis of volatile organic compounds present in the ground water.

It is EPA's understanding that Cannon AFB is currently in detection monitoring for Landfill #5, Cell #3. The 40 CFR §265.92(b)(3) parameters which are used as indicators of ground water contamination for this unit include:

- (i) pH,
- (ii) Specific Conductance,
- (iii) Total Organic Carbon, and
- (iv) Total Organic Halogen.

If volatile organic constituent concentrations were included in the required monitoring for this unit, EPA would concur with NMEID's proposed violation. However, since testing for volatile organic constituents are not required for detection monitoring, EPA suggests that NMEID not issue the additional regulatory violation, and address it instead as a technical deficiency.

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EPA agrees that NMEID should include a technical deficiency concerning the exclusion of monitoring well total depth measurement by the Cannon AFB Sampling and Analysis Plan. Measurement of the total depth is necessary in order to ensure that the wells are intact to the original depth. Measurement of the well depths on an annual basis would provide a means of making this determination.

Should you have any further questions, please feel free to contact me at (214) 655-6745, or have your staff contact Bobby Williams at (214) 655-6790.

Sincerely,

Samuel Coleman

for Randall E. Brown, Chief
RCRA Enforcement Branch (6H-C)