



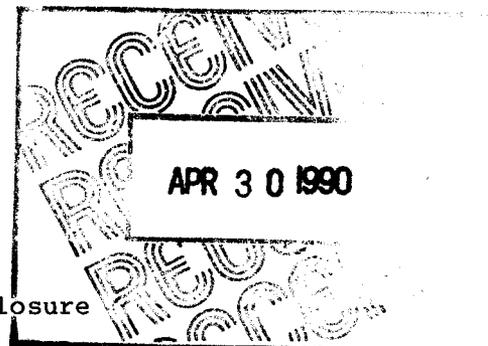
Bill

CAFB - red

DEPARTMENT OF THE AIR FORCE

HEADQUARTERS 27TH COMBAT SUPPORT GROUP (TAC)
CANNON AIR FORCE BASE, NM 88103

26 APR 1990



Mr. Jack Ellvinger, Chief
Hazardous Waste Bureau
New Mexico Environmental Improvement Division
Harold Runnels Building
1190 St. Francis Drive
Santa Fe, New Mexico 87503

RE: EID's NOV Letter 1 Mar 90 on Landfill 5, Cell 3 Closure

Dear Mr. Ellvinger

On 5 Apr 90, representatives of Cannon Air Force Base met with representatives of the EID Hazardous Waste Bureau to discuss Cannon's response to the referenced Notice of Violation (NOV) received by CAFB on 6 Mar 90.

I am enclosing two additional documents (QA/QC Report and Lab Summary) which were not available in my 4 Apr 90 response. I have also been informed that Cannon is required to have a survey conducted on Cell 3 by a certified surveyor and the plat is to be recorded in accordance with the requirements under NMHWMR-4 Section 206.C.2.i. The survey work will have to be accomplished under separate contract. I anticipate the work will be completed within the next 30 days.

Your cooperation in this matter is greatly appreciated. Any further questions can be directed to Mr. Jim Richards at (505) 784-4639.

Sincerely

David E. Benson
DAVID E. BENSON, Colonel, USAF
Commander

- 2 Atch
- 1. QA/QC Report (Bradley Constr)
- 2. Lab Summary (IT Corporation)

**Bradley**

GENERAL CONTRACTORS

CEL3-023

April 19, 1990

Base Contracting Division
27 TFW/LGCK Building 150
Cannon AFB, New Mexico 88103-5320

(505) 784-2948
FAX 784-2941

Attn: Mrs. Caroline Ponce, Contracting Officer
Ref: Closure of Cell No. 3, Landfill Area No. 5
F29605-89-C-0009
Cannon AFB, NM
Subj: Warranty Work Per Your April 3, 1990 Letter

Dear Mrs. Ponce,

In response to cited letter, please accept this as our response to the items therein.

Regarding field changes to plan details, Bradley Construction, Inc. made a few approved changes in order to expedite the project by taking advantage of locally available material or in recognition of local conditions. These are listed below:

1. Our field forces encountered landfill debris while rough-grading the area prior to installing the clay cap layer. This led us to deduce that the top covering layer was not placed to meet a certain uniform elevation above mean sea level, as we had to grade to in our contract, but was placed as a thickness above the landfill contents. Because of this close encounter with the debris, we had to immediately effectuate a working solution to install all the necessary layers and get the best available slope on the drain gutter. Therefore, it was logically decided, in the field with concurrence from all parties involved in the contract, that we would establish the clay cap subgrade at a certain elevation which would allow other components to properly function.

At that point we elected to use the available pre-cast trough units from the local supplier rather than re-design the drain trough. This did require us to re-design the footing, but that was simple enough for us to quickly handle.

Therefore, the first change was the recognition that the existing subgrade was not uniform. Since our cap had to be installed fairly uniformly, we established the rough subgrade at an elevation a bit above where we thought we would otherwise have used. This activity was performed in accord with the requirements of Spec. Sect. 2B-2.1.

Bradley Construction, Inc.
8300 Washington, NE
Albuquerque, N.M. 87119
(505) 823-2800
1-800-432-5476 in state

Bradley Construction, Inc. April 19, 1990
to Cannon Air Force Base (LGCK) Contracting

2. The second difference was the use of clay with a lower permeability than specified. We were able to find a local source of clay with a permeability of 10 to the minus 7 permeability which is less permeable than the 10 to the minus 6 clay specified. This was done at no additional cost to the Government.

3. The third difference, mentioned above, was the installation of differently shaped drain trough components. The footing was installed as a continuous, continuously reinforced with concrete reinforcing bars in lieu of welded wire fabric, concrete structure, one foot thick to provide a stable base for the drain trough units. The footing is able to bridge any weak soil pockets which may develop, as often happens along the edges of landfill cells. The footing is also able to resist lateral earth pressures from the call cap. This feature was enhanced by the added sloped fill we installed at the outboard side of the drain trough.

The drain trough was installed using locally available units which were installed to drain the runoff from the cap along the available gradient at the site. This change was approved prior to implementation. This change carries the added feature of having locally available replacement units should the need arise.

4. The fourth difference is that we installed a security-type chain link fence with barbed wire at the top in lieu of the barbed wire fence specified. Again this was approved by all parties prior to beginning. This fence provides greater security and was installed at no increase in costs to the Government.

5. As we mentioned previously, there was not enough time in the contract to do a test cap, wait around for reviews and then start the real one. We were only dealing with soils and other products with which were familiar from other projects. To wait for approval and delivery of enough hypalon for the test cap would have consumed 30 to 35 calendar days of the 70 day contract. Whoever wrote the ideal situation as desired had no idea of reality pertaining to field operations and event sequence timing. It was essentially impossible to do it the way the contract desired. Therefore, with concurrence of those involved with the reality of the contract, we did it differently. We put the main principal contract work as the priority. We were always confident that we would install the soil layers and special products to conform to the contract and perform the desired result.

6. We had no quality control issues which deviated from norms established in the construction industry. The clay soil moisture content varied from optimum a bit, but that is entirely normal. We rolled the soil, expending sufficient compactive effort to obtain required relative density. The soil compaction was tested and all tested areas passed by meeting or exceeding the minimum required relative density.

We brought in the manufacturer's regional representative to help us assure that we installed the hypalon correctly.

Bradley Construction, Inc. April 19, 1990
to Cannon Air Force Base (LGCK) Contracting

The clay soil and the hypalon seemed to us to be the guts of the cap system. We got better clay than required and had the added quality assurance of the hypalon installation expert on site for that operation. We provided better than required components for the drain trench and fence in an effort to install something which would exceed contract requirements. We thought that everybody knew that as the site was visited daily by any number of the Government's representatives.

The above outlines the operation the way we saw it as we did it as well as how we now see it. The variances were dictated by job and local conditions.

Again, the mentioned presence of methylene chloride in an IT Corporation report. Please refer to the information in the attached copy of an April 2, 1990, IT Corporation letter which reports that the lab blanks for the days involved show no presence of methylene chloride in the lab. This should again put the issue to rest. If we can be of further assistance, please let us know.

We are having trouble understanding what other actions we can do regarding a Warranty response under the Warranty of Construction contract clause. If this letter is not sufficient, please let us know what else you want.

If you don't tell us to do anything else, we will properly conclude that we have your agreement that this letter is sufficient response to your April 3, 1990, letter and that all open Warranty issues are herewith fully resolved.

Thank you for your time and attention to this matter.

Sincerely yours



Phillip E.A. Armstrong
Senior Project Manager

cc: J. Bradley



RECEIVED

APR 16 1990

April 2, 1990

BRADLEY CONSTRUCTION

Mr. Phil Armstrong
Senior Project Manager
Bradley Construction Company
830 Washington, NE
Albuquerque, New Mexico 87113

Project No. B3515K.01

Analytical Results Review, Cannon Air Force Base

Dear Phil,

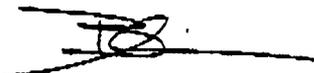
At your request I have reviewed the volatile organic analytical (VOA) results of Industrial Hygiene measurements performed during the construction of the Cell 3 landfill cap at Cannon Air Force Base (CAFB), New Mexico. With the exception of very low levels of methylene chloride, analyses indicated an absence of volatile organics of industrial hygiene concern in the breathing zone of site workers.

In order to address the concerns of the New Mexico Environmental Improvement Division (NM EID), I contacted the IT laboratory in Austin, Texas, requesting a detailed examination of laboratory analytical records for the days of analysis of the CAFB samples. Their review indicated the laboratory blank sample was free from methylene chloride contamination. This indicates the reported values for methylene chloride were actual concentrations, not laboratory contamination.

The results indicate very little methylene chloride was present. The actual exposure of personnel was a maximum of 1/250th of the 50 ppm Threshold Limit Value[®] for this material, presenting no appreciable health hazard to site personnel.

It is not possible to identify a source of contamination. Methylene chloride is found in paints, paint strippers, some agricultural materials, building materials, etc. This fact, in combination with the very low levels of methylene chloride found, produces the inability to identify a discreet source for this material.

Very truly yours,


Brian G. Klenk, IHIT
Health and Safety Manager

cc: File

Regional Office

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