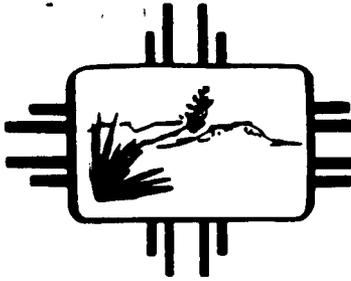


CAFB - ref



New Mexico Health and Environment Department

GARREY CARRUTHERS  
Governor

DENNIS BOYD  
Secretary

MICHAEL J. BURKHART  
Deputy Secretary

RICHARD MITZELFELT  
Director

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

June 29, 1990

Colonel David E. Benson, Commander  
27th Combat Support Group  
Cannon Air Force Base, NM 88103

RE: NM 7572124454  
Landfill 5, Cell 3 Closure  
Request for Additional Information

Dear Colonel Benson:

The New Mexico Environmental Improvement Division (EID) has received Cannon Air Force Base's (CAFB) responses, dated April 4, April 26 and May 31, 1990, to the Notice of Violation (NOV) issued by EID on March 1, 1990. EID has reviewed in detail the materials submitted by CAFB in response to the NOV and is concerned that the final cover may not cover all of Cell 3, that the design changes may have impacted the integrity of the cover and that the test cap was not constructed concurrently with the cover of Cell 3 as required by the approved closure plan. Based on EID's Memorandum of Understanding with the Environmental Protection Agency (EPA), non-compliance with an approved closure plan is a high priority violation. If the additional information and clarification requested by EID does not adequately answer these concerns, then EID may pursue enforcement action against CAFB to ensure that closure of Cell 3 meets the requirements of the approved closure plan and the Hazardous Waste Management Regulations-5, as amended 1989 (HWMR-5, as amended 1989). EID's response to the information provided by CAFB to date on each of the violations cited is listed below.

1.a. Annotated map with location of test cap.

Moving the test cap location to place it on an area that had not been used as a cell is acceptable; however, as explained in 2.b. below, it is not acceptable to delay construction of the test cap until after the final cover has been completed.

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1.b. Copy of QA/QC report.

The report provided in the correspondence dated April 26, 1990 satisfies EID's request, per the approved closure plan, for the QA/QC report generated from the Quality Control Program.

1.c. The information submitted April 4, 1990 as a response to this item satisfies EID's request, per the approved closure plan, for the final report.

1.d. Certification of closure

Certification of closure is not accepted at this time.

2.a. Location of Cell 3 final cover

The information provided by CAFB in its correspondence does not satisfactorily answer EID's concerns about the relationship of the final cover to Cell 3. It appears from the daily field log, that 1) the location initially surveyed was found to be incorrect and the cell was relocated (July 12) using the plat information developed in 1988, and 2) after rough grading was well underway (July 19), the location of the final cover was moved again 15 feet to the west. The decision to move the cover 15 feet west appears to have been made because of the appearance of the graded cell area, not because of the reestablishment of the May 1988 cell locations. The field logs also indicated that, because of the potential for intersecting landfill debris during the diggings for the footings, the decision was made to pour the footings above ground to eliminate any chance of causing a release of gasses during excavation of the trench. The QA/QC Report submitted in CAFB's April 26 response, also verifies the above sequence of events and states that, because landfill debris was encountered while rough grading the area prior to installing the clay cap layer (the two foot cover as described in the approved closure plan was not actually present), the decision was made to change the grade elevation and to change the footing design.

With an east-west cell dimension of about 40 feet and an extension of the cover about six feet away from the edge of the cell in each direction, relocation of the cover 15 feet west could have resulted in about nine feet of the cell being exposed.

Please provide additional documentation of the actual location of Cell 3 including, but not limited to, historical aerial photographs of the area, recent aerial photographs

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(within the last three years) and any additional information available to further pinpoint the location of cell 3.

EID is also concerned about the design changes made to the drainage system and is still reviewing the information submitted by CAFB to determine if the changes have affected the integrity of the cover.

2.b. Test cap construction

The test cap was to be constructed concurrently with the final cover. This process should not have delayed the construction of the final cover. The purpose of the test cap was to test the procedures to be used in laying down the final cover and to perform the required tests regarding the final cover performance on the test cap, not on the final cover. Using a test cap, the performance of the final cover can be predicted without damaging its integrity. Both the approved closure plan and CAFB's specifications for closure of Cell 3 dated March 1989 emphasize the importance and purpose of the test cap. In spite of the this emphasis on the test cap, CAFB decided to deviate significantly from the approved closure plan for reasons unrelated to engineering and physical conditions encountered during closure activities. If there are any questions in the future regarding the performance of the final cover, the test cap cannot be used with any certainty because it was not constructed concurrently with the final cover. Installation of a test cap is not a situation unique to CAFB; it is standard procedure for RCRA landfill closure-in-place. EID is still considering what action to take regarding this issue.

3. Presence of methylene chloride at Cell 3

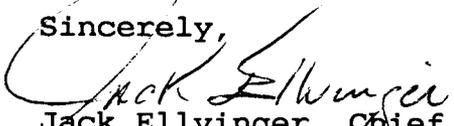
CAFB's response satisfies EID's request for an explanation of the presence of methylene chloride in the samples taken during closure activities. Methylene chloride apparently was present in the air space during the grading operation at Cell 3. If, in the future, methylene chloride is detected in the groundwater monitoring system at the landfill or additional information is obtained that indicates that methylene chloride may have been disposed of in Cell 3, CAFB may be required to redetermine what wastes actually or possibly were disposed of in Cell 3 and make the appropriate revisions or amendments to the Part A, closure plan and deed notices.

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After further review of the closure plan schedule, EID noted that CAFB was to submit its QA/QC plan to EID at A (Approval date of closure plan) +3 weeks. CAFB did not submit its QA/QC plan to EID.

Please provide the requested information in Item 2.a. within 30 days from receipt of this letter. CAFB indicated in its April 26, 1990 correspondence that the survey on Cell 3 as required by HWMR-5 is still outstanding. CAFB indicated that the survey would be complete by about May 30, 1990. Please provide the survey information within 30 days from receipt of this letter.

Sincerely,

  
Jack Ellvinger, Chief  
Hazardous Waste Bureau

JE/SMM/smm

cc: Felicia L, Orth, General Counsel, EID  
Lynn Prince, U.S. EPA Region VI  
Marc Sides, U.S. EPA Region VI  
Jim Richards, CAFB