



BRUCE KING
GOVERNOR

*File
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Please Return
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JUDITH M. ESPINOSA
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DEPUTY SECRETARY

October 9, 1992



Mac A. Crawford, Captain, USAF
Chief, Restoration Section
27 CES/CEV
111 Engineers Way
Cannon AFB, NM 88103-5136

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Dear Capt. Crawford,

The New Mexico Environment Department (NMED) has reviewed the Remedial Investigation Report (RI) for 18 solid waste management units at Cannon AFB dated May 15, 1992. Under the auspices of the DSMOA, we offer the following comments in addition to those made by the Hazardous and Radioactive Materials Bureau concerning Landfill 5.

We concur with EPA comments on the RI provided during the September 17, 1992 meeting in Dallas, TX. In addition to EPA comments provided at the meeting, NMED has the following specific comments.

We would like to reiterate a request that was initially made in a letter from David Morgan to Jim Richards dated September 11, 1992. Landfill 5 groundwater sampling, as well as monitoring well sampling at other IRP sites, should include water chemistry analyses as well as RCRA-required analyses. These analyses should include at least major ions, total dissolved solids (TDS), charge balance, and nitrogen species. The reason for this is two-fold: contaminants such as nitrate, chloride, sulfate, and TDS are regulated by the New Mexico Water Quality Control Commission even though they are not legally defined as hazardous waste; and water chemistry information can often assist in its own right in understanding site hydrology, at a very minimal cost.

Procedurally, we are not concerned whether water chemistry sampling is incorporated in the RI report or not, so long as it is performed. At sites such as Landfill 5 where ongoing sampling is in effect, annual water chemistry samples will be adequate. At future one-time sampling events, one water chemistry sample per well will be adequate.

Another concern not specifically related to the RI is the possible future need for discharge plans for such facilities as the washrack oil/water separators that still discharge to drainage ditches. We appreciate the list you have already provided as part of the sewage

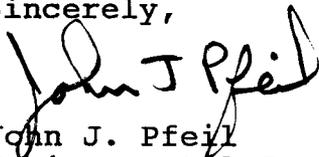
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lagoon discharge plan application, and no further action on your part is required as of now.

We notice in reviewing the change pages transmitted to us on October 6 that barium is not mentioned as a parameter to be monitored at the NE Stormwater Drainage Area, either on page 20-14 or ES-13. Since barium concentrations found at this site are very near RCRA Subpart S action levels (some 3800 ppm, where the proposed action level is 4000), we believe it should be monitored for.

Thank you for the opportunity to review the RI documents.

Sincerely,



John J. Pfeil
Environmental Specialist, DSMOA
Ground Water Protection and Remediation Bureau

c: Edward Horst, NMED HRMB
Rich Mayer, EPA Region 6