

CAFB 93



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February 2, 1993

General Richard N. Goddard
Commander
27 FW/CC
100 S DL Ingram Blvd.
Suite 100
Cannon AFB, NM 88103-5214

Dear General Goddard:

Enclosed is a copy of the minutes from a meeting held between NMED Hazardous and Radioactive Materials Bureau and Ground Water Bureau staff and various representatives from Cannon AFB.

The four main topics addressed at the meeting were: communication protocol, Landfill 5 RIF Workplan activities, Landfill 5 Cell 3 closure plan activities and a Notice of Deficiency for the Melrose Missile Range.

I feel that much was gained by this meeting by both NMED and Cannon AFB staff. If you have any questions concerning this meeting feel free to call me at (505) 827-4308.

Sincerely,

Barbara Hoditschek

Barbara Hoditschek
Program Manager
RCRA Pemits Section

Enclosure

cc: Benito Garcia, Chief, HRMB
Jim Richards, 27CES/CEV
David Morgan, NMED, GWB
Steve Alexander, NMED, HRMB
Tom Tatkin, NMED, HRMB
Thomas Manning, Reg. Compl. Officer, AFCEE
Stephanie Stoddard, NMED, HRMB

Minutes of Meeting held between NMED (Hazardous Waste and Radioactive Materials Bureau) (Surface Water Bureau) and Cannon AFB on January 14, 1993, Harold Runnels Building, Rm N2102, 9AM to Noon

The meeting was called to order by Barbara Hoditschek, Program Manager of the Permitting Section of the HRMB. Everyone present introduced themselves. A meeting attendance list was circulated and a copy is attached to this document.

The first order of business was a discussion concerning communication protocol. The first item discussed was timeliness on dates and actions cited in written documents. It was emphasized by Ms. Hoditschek that an administrative record must be established for all RCRA related activities with facilities. Therefore, for the purpose of compliance, all dialogue between NMED and CAFB is to be finalized in writing. CAFB would be subject to enforcement action if no written document is on record to verify compliance. If CAFB acts on any verbal agreement made by HRMB without written follow-up, they do so at their own risk.

When CAFB receives a written communication from HRMB, timelines set are firm dates. Correspondence with timelines will automatically be followed by a Notice of Deficiency (NOD) if the appropriate action requested by HRMB is not completed by CAFB. All letters containing timelines will be sent to CAFB by certified mail and it was recommended that CAFB respond to HRMB by certified mail.

If CAFB has any problem with a timeline, they are to notify NMED immediately. It is hoped however, that timelines set down on paper have been previously discussed with NMED staff and CAFB. Some timelines must be set according to RCRA regulations. Jim Richards of CAFB indicated this format was agreeable with his staff.

Discussion on communication then focused on dialogue with CAFB contractors. Ms. Hoditschek indicated that the official point of contact was CAFB and not their contractors. Staff contact with contractors is for clarification needs only. CAFB will need to inform contractors of this fact. In any case, no verbal discussion between HRMB staff and a contractor is official until written follow-up from CAFB is received and confirmation by NMED is established. At this time it was also determined that NMED was to direct their written correspondence to General Richard N. Goddard, Commander, CAFB.

The next item of discussion was the Landfill 5 RFI Workplan. Comments were directed to CAFB by Steve Alexander, Supervisor for the HRMB Technical Section. Immediately below are the questions (Items) which Mr. Alexander presented to CAFB concerning the December 30, 1992 proposed Workplan Outline. Quotes in parenthesis below are taken directly from the text and are provided for clarity. Technical comments/questions follow the quotes. CAFB responses follow in **boldface**.

Item Description

- 1 (Cover letter: ...no additional monitoring wells,...)

How does CAFB propose to adequately monitor the entire downgradient perimeter of the landfill with only the existing well system? Which wells would be utilized? Also, several existing monitoring wells (B,C and D) are apparently screened greater than thirty feet below the top of the aquifer, how can they adequately monitor the uppermost aquifer? NOTE: The 7/90 Compliance Agreement notes the inadequacy of wells B,C, and D.

At this time CAFB does not believe additional monitoring wells are necessary to adequately monitor LF #5. However, following evaluation of the results from the vadose zone characterization CAFB may conclude that additional monitoring wells are justified.

- 2 (CAFB shall begin determination of RCRA background... This requirement, as stated above, has been met by CAFB)

HRMB does not doubt CAFB has begun the determination of RCRA background groundwater quality. The concern is whether the four quarters necessary will be valid. HRMB needs assurances that the four quarters for the monitoring well system are the same four quarters for each well.

Request that HRMB write a letter describing the assurances necessary from CAFB in order to obtain NMED's certification that CAFB's obligations under the 7/90 Compliance Agreement shall can be terminated. CAFB strongly asserts that all obligations under the CA have been met.

- 3 (Objective ...and vadose modeling...)

What is meant by "modeling"?

Any vadose modeling done will be used as an aid in the location of sampling points within the coring/sampling program.

- 4 The Hazardous and Solid Waste Amendments (HSWA) permit

(NM7572124454) directs CAFB to conduct investigations of SWMUs to adequately define existing or suspected sources of contamination. (TASK III: FACILITY INVESTIGATION, B.

Source Characterization). Existing information in the May 1992 Draft RI report, concerning SWMU #113 "Source Characterization", is inadequate and of limited detail. Specifically, the May 1992 Draft RI report estimates that between 36,000 to 72,000 gallons of "waste oils and solvents" were disposed of between 1968 and mid-1981. Is this true? Documentation addressing estimates of the total volume of waste oils and solvents disposed, their chemical composition, when they were disposed, and if the waste containers were punctured, poured or simply dumped into the landfill must be provided.

Records of waste disposal are incomplete. It may not be possible to provide additional information related to wastes disposed in landfill #5.

- 5 (Phase I Soil Gas Survey Points (+/-1200) to be sampled and screened for VOCs using a PID/FID)

What is the depth of each point? Is it within the cells or some distance below?

The location of the points will be within the landfill cells and at differing vertical locations within the cells.

- 6 (Phase I Soil Gas Survey...ten percent (+/-120) shall be analyzed using a field GC. All GC analysis shall be performed for the following compounds: aliphatic and aromatic fuel related hydrocarbons, halogenated hydrocarbons, and volatile organic compounds.)

Describe the capabilities of the field Gas Chromatograph, specific analytes, analytical methods, detection limits and quantitation limits.

This information will be provided in the formal Workplan to be submitted.

Also, how are the ten percent to be selected?

This has not been determined yet.

- 7 (Phase II Approximately 60 soil borings (+/-3600') shall be drilled through LF#5...)

What is meant by "+/-3600'?"

Total linear feet of coring.

- 8 (Phase II The borings shall be drilled to a depth of 40 feet below the bottom of the landfill,...)

It may be acceptable to drill 20' below the bottom of the landfill, providing the sample intervals are 5' each and allowances are made for deeper drilling should contaminants be detected in the 20' column. Also, should contaminants be detected at any point within the sample depth additionally drilling/sampling may be necessary.

CAFB would prefer to drill the forty feet, which is based on direction received from Dr. Bruce Swanton, HRMB, in determining an adequate "clean" vertical core.

- 9 Data Collection and Management Plan: CAFB is required to complete "TASK II: RFI WORKPLAN REQUIREMENTS, A. Data Collection Quality Assurance Plan and B. Data Management Plan", of their HSWA permit (NM7572124454).

CAFB will provide a Data Collection and Management Plan. It may come under a different title but will meet the requirements.

- 10 (Analysis)

Due to the thirteen years of incomplete documentation concerning waste management at the facility why isn't CAFB running full Appendix IX sample analyses on the soil core samples? This will include those constituents not listed in the CERCLA Target Compound List (TCL). Analytical methods used must give the lowest quantitation limits, for example:

Volatiles	8240
Volatiles	8010
Semi-volatiles	8270
Organochlorine-pesticides and PCB	8080
Chlorinated-herbicides	8150
Organophosphorus-pesticides	8140
Cyanide	9010
Sulfide	9030

Metals

<u>6010</u>	<u>7060</u>	<u>7191</u>	<u>7421</u>	<u>7470</u>	<u>7841</u>
Antimony	Arsenic	Chromium	Lead	Mercury	Thallium
Barium				Selenium	
Beryllium					
Cadmium					
Cobalt					
Copper					
Nickel					
Silver					
Tin					
Vanadium					
Zinc					

CAFB believes the constituents listed along with the 10 peak library search for volatiles and the 20 peak library search for semi-volatiles will be adequate considering the range of suspected contaminants and analytical costs.

On the data reporting sheets the chemical constituent, method of analysis, practical quantitation limit (PQL)

and method detection limit (MDL) must be shown. When reporting values for analysis of soil chemical constituents that are quantified at less than the PQL, use a format which indicates this, e.g. <0.01 ppb. All estimated values for any J-flag constituent (a constituent identified below the PQL but above the MDL) must also be reported.

Must provide a description of laboratory protocols and data which are used to establish detection limit values. The laboratory should ensure that any values which are reported above a limit of detection are quantifiable as per the U.S. EPA Executive Summary "RCRA Ground-Water Monitoring Technical Enforcement Guidance Document."

CAFB agrees to all of the above.

After Mr. Alexander's presentation of the Landfill 5 RFI Workplan, Ms. Stephanie Stoddard of the RCRA Permitting Section led a discussion on Landfill Cell 3 activities.

Stephanie presented two sets of letters (attached) regarding Cell 3 showing how the system of informal communication between NMED and CAFB resulted in the following misunderstandings:

1. NMED discussed what procedures CAFB must follow for amending a closure plan according to 40 CFR 265.112(c). CAFB committed over the phone to send a letter which was to address the requirements of 265.112(c) by 7/31/92 in order that the public comment period for approval of the closure plan could begin. NMED received the letter from CAFB dated 8/6/92. This letter did not contain the information previously agreed upon nor did it meet the requirement of 265.112(c) which was necessary for the administrative record.

2. The second example referred to CAFB's Submitting a closure and post closure plan for public comment (entitled: "Closure and Post Closure Plan for Landfill Cell No. 3 at Cannon Air Force Base"). Prior to the submittal of this document, NMED discussed at length over the phone with CAFB that only the closure plan was submitted for public comment. Because the submitted document inaccurately included the post closure plan, NMED's 9/22/92 approval letter specified that only the "closure plan portion (pp.1-38) of the document was approved". Stated in CAFB's response to the 9/22/92 letter NMED is approving the August 1992 version of the plans and specifications for the closure and post closure..." clearly

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indicating a lack of understanding of the RCRA regulations..

Mr. Richards indicated CAFB did not specifically have a person on staff that was an expert on RCRA regulations. Ms. Hoditschek indicated that CAFB needed to hire staff that understood the RCRA regulations since CAFB was ultimately liable to meeting the requirements of those regulations.

The last discussion involved the Melrose Air Force Range December 22, 1993, Notice of Deficiency (NOD). Tom Tatkin of the RCRA Permitting Section took the lead in this discussion.

Ms. Hoditschek gave a review of the chronological sequence of transactions beginning with the October 30, 1992 preliminary technical review letter, then the November 6, 1992, site visit, proceeded by CAFB's November 30, 1992 response and finally issuance of the December 22, 1992 NOD.

Vera Wood of CAFB pointed out that CAFB Environmental Section did not receive their copy of the NOD until January 8, 1993. Tom Tatkin indicated a certified mail receipt has been signed December 28, 1992 by a CAFB representative.

Mr. Richards and Ms. Wood of CAFB indicated that a NOD response of 30 days was unrealistic for them to meet. Mr. Richards preferred a 180 day extension particularly for the response to information on waste analysis. Ms. Wood also indicated she was having difficulties collecting historic information on what had been treated at the OB/OD site.

Tom Tatkin suggested that a misunderstanding may exist and that CAFB needed only classify wastes that would be treated under a RCRA permit. Tom also suggested that in order to help CAFB meet the 30 day timeframe, that CAFB consider submitting a limited list of explosive waste which could be permitted, and later submit a permit modification when a more complete list was developed. He also added that if CAFB decided not to pursue this option and a permit was denied based on the lack of sufficient information to process the draft permit, that CAFB would lose their interim status. However CAFB may want to take the time to resubmit the application when the necessary information became available and in the interim send their waste to a permitted facility such as Hollaman or Kirtland AFB.

In summation, Ms. Hoditschek indicated CAFB's response to the NOD would be evaluated (this would include any requests for

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extensions), and a determination made whether to proceed with an Order and/or permit denial.

CAFB representatives indicated that the NCD response would be forthcoming.

Before the meeting was adjourned it was suggested that a one week notification for scheduling of any meetings regarding permitting issues was required.

The meeting was adjourned at noon.