



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

APR 15 1994



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Steele/Burkman
file
APR 19 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

General William M. Guth, Commander
United States Air Force
Headquarters, 27th Fighter Wing (ACC)
Cannon Air Force Base, New Mexico 88103-5214

Re: Notice of Deficiency, RFI Phase II Workplan for Landfills
3 & 4, Cannon Air Force Base, EPA I.D. NO. NM7572124454

Dear General Guth:

The Environmental Protection Agency (EPA) has completed a technical review of the RCRA Facility Investigation (RFI) Phase II Workplan for Landfills 3 & 4. Enclosed is a list of deficiencies for your review.

You shall have thirty (30) days from the receipt of this letter to submit the information requested in the enclosed list of deficiencies.

If you have any questions, please contact Bill Hurlbut of my staff at (214) 655-8305.

Sincerely yours,

/s/ William K. Honker

William K. Honker, P.E.
Chief, RCRA Permits Branch

cc: Benito Garcia
New Mexico Environment Department



**LIST OF DEFICIENCIES
CANNON AIR FORCE BASE
EPA ID NO NM7572124454**

1. GENERAL COMMENTS

- a. The Workplan doesn't include a timeline which shows when this work will be completed or when the RFI Phase II Report will be submitted to the EPA. This will need to be included in the revised workplan.
- b. The Workplan which you submitted contains information on Landfills 3, 4, and 25. As we agreed to in our last meeting at EPA Headquarters and as you confirmed on the telephone on April 14, 1994, this workplan is only for Landfills 3 & 4 and not Landfill 25. The Workplan for Landfill 25 is to be submitted on May 19, 1994, with the Phase II Workplan for the Appendix III SWMUs. This will need to be corrected on the revised workplan for Landfills 3 & 4.
- c. If Cannon AFB finds existing wells which are to be used as the downgradient monitoring wells for Landfills 3 and 4, Cannon AFB shall notify the EPA with a description of how the well was constructed such as the depth of the screened interval, length of screen, etc.

2. 4.5 SAMPLE LOCATIONS AND FREQUENCY

- a. During the installation of new monitoring wells, the soil samples will need to be screened in the field for "hot spots" with a PID or equivalent instrument.

3. 5.3.1 MONITORING WELLS

- a. Screens in existing or newly completed monitoring wells should be no longer than 15 feet in length and screened in the top of the regional aquifer.

4. 5.6 GROUND WATER SAMPLING

- a. When samples are collected, no preservatives shall be used with the samples to be analyzed for Volatile Organic Compounds (VOCs) per the Technical Enforcement Guidance Document (TEGD).
- b. Ground water samples taken will be unfiltered.

5. 5.9.3 DECONTAMINATION WATER

- a. This workplan doesn't describe how any decontamination or well development water will be disposed. This will need to be included in the revised workplan.