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April 18, 1994

General Guth, Commander
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Cannon AFB, New Mexico 88103-5214

XIII



RE: Review of Cannon Air Force Base's February 16, 1994 Draft RCRA Facility Investigation Work Plan for Landfill No. 5 (SWMU 113) Response to Notice of Deficiency EPA ID No. NM7572124454

Dear General Guth:

The Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department (NMED) received Cannon Air Force Base's (CAFBs) February 16, 1994 response to the November 29, 1993 Notice of Deficiency (NOD), for the Draft RCRA Facility Investigation (RFI) Work Plan for Landfill No. 5 (SWMU 113). On December 15, 1993 HRMB, CAFB, Woodward-Clyde, and the U.S. Army Corps of Engineers met to discuss the requirements of an adequate RCRA Facility Investigation Work Plan. HRMB also provided a copy of notes from this meeting to CAFB. However, there are still some major points which have not been addressed adequately in the latest submittal.

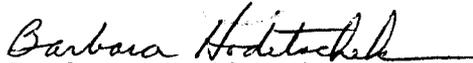
Two particularly serious deficiencies are the incomplete objectives and the failure to clearly describing how specific data needs meet the objectives. The objectives must include an "if..., then...", statement detailing the potential followup actions to be carried out if a particular finding is made. These deficiencies are apparent in CAFB's response to the NOD in general comments number one and two of the NOD, and in several other of the NOD specific comments.

Attachment A to this letter outlines major items in the NOD which have not been addressed adequately in the Draft RFI Work Plan. CAFB has 30 days from the date of this letter to revise the Draft RFI Work Plan for submittal as the Final RFI Work Plan incorporating these comments. Once HRMB receives the Final RFI Work Plan, it will be reviewed for approval, denial, or approval with modifications within 45 days of receipt as stated in the HRMB letter of July 23, 1993 regarding review timetable for the RFI at Landfill #5 (SWMU 113).

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The review of this latest submittal was performed in coordination with Bill Hurlbut of the EPA. Additionally, Steve Pullen of NMED's Defense/State Memorandum of Agreement (**DSMOA**) Program has been kept appraised on progress. If you have any questions, please contact Lee Winn at (505) 827-4313.

Sincerely,


Barbara Hoditschek,
Program Manager, RCRA Permitting

xc: Steve Alexander, HRMB
Dave Morgan, IRP/GRPRB
William Honker, EPA Region VI
Barbara Hoditschek
File, CAFB Red 1994
(File: BCAF2)

ATTACHMENT A

In the submittal of the Final RFI Work Plan, CAFB must include an attachment which lists the following items, including the pages in the Final RFI Work Plan submittal where these items are addressed. Additionally, text in the Final RFI Work Plan which differs from the Draft RFI language should be noted for easy reference.

ITEM COMMENT

1. Response to general comment number 1.

The purpose of a RCRA Facility Investigation (RFI) is to obtain information to fully characterize the nature, extent and rate of migration of releases of hazardous waste or constituents and to interpret this information to determine whether interim corrective measures and/or a Corrective Measures Study may be necessary. In order to fully serve the purpose of an RFI four objectives must be met:

A. determine whether releases of hazardous waste or hazardous constituents have occurred from the Resource Conservation and Recovery Act (RCRA) regulated unit(s) and/or RCRA Solid Waste Management Unit(s);

B. if releases have occurred then the facility must determine the nature (chemical composition and direction), rate (vertical and horizontal) and extent (vertical and horizontal) of those releases;

C. identify and collect data necessary to determine the potential threat to human health or the environment, and

D. identify and collect data necessary to determine whether interim corrective measures are necessary and to support the evaluation and selection of the final Corrective Measures Study.

There are several conflicting statements about the objective(s), goal(s), intent, "focus", etc., of the RFI throughout the text of Volume I and II of the draft Phase I Work Plan which must be clarified by CAFB. Please provide a clear statement of the objectives of the RFI, how the RFI will address the four objectives listed above, which of the four objectives Phase I is to address, and fully describe any additional phases which may be required to fulfill the stated objectives.

2. Response to general comment number 2. This RCRA Facility Investigation is intended to be conducted through a phased approach. Depending upon the results from any phase of the investigation, additional sampling and analysis may be required to adequately assess the composition, rate, and extent of contaminant releases, determine the potential threat

to human health and the environment, and support any interim corrective measures and the Corrective Measures Study (CMS). Additionally, NMED may require additional ground-water monitoring wells and/or vadose zone monitoring to adequately detect releases from SWMU #113, as part of the chosen corrective measure(s).

Provide specific data quality objectives (DQOs) which address specifically items 1. a-d above as well as how these objectives will be divided into phases. This topic should be described in a **clear, concise** way. The implementation process which fulfills the objectives must then be described in a **concise** way. The RFI Phase I Work Plan must relate **specific** criteria based on **specific** data quality objectives which may lead to a Phase II (or III, etc.) investigation. In addition to the phased approach, CAFB must clarify this by including a detailed decision tree.

3. **Response to specific comment 3.** CAFB must provide relevant references, historical information, and empirical information on the nature of fractures in the caliche.
4. **Response to specific comment 5.** The list of potential corrective measures is incomplete. The RFI Work Plan must address potential corrective measures technologies which may be used on-site or off-site for the containment, treatment, remediation, and/or disposal of contamination. Additionally, the RFI work plan must identify any field data needed to satisfy Data Quality Objectives and to facilitate the evaluation and selection of the final corrective measure(s). This data must be of adequate technical quality to support the development and evaluation of the corrective measures alternative or alternatives during the Corrective Measures Study. The inclusion of this section in the work plan will not preclude the need for a formal Corrective Measures study based upon the findings of the RFI.
5. **Response to specific comment number 7.** If CAFB chooses to determine background levels for site specific naturally occurring metals, this must be submitted to NMED in a separate submittal for review.
6. **Response to specific comment number 9.** Please provide justification to support the adequacy of thirty borings and the supporting data quality objectives which address:
 - 1) determining whether a release had occurred from the unit,
 - 2) characterizing the composition, rate, and extent of any release,
 - 3) characterizing the source,
 - 4) the need for additional release characterization, and
 - 5) supporting the corrective measures study.

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7. **Response to specific comment number 10.** The RFI Work Plan must address source characterization and the risk of potential releases from the landfill in the DQO process. Qualifying and quantifying the potential for releases from the landfill will be important in evaluating the need for possible corrective measures.

8. **Response to specific comment 16.** CAFB must also describe how 40 CFR 264 Subpart S action levels, baseline risk assessment, and/or background concentrations will support DQO's. The choice of analytical methods must be based on DQO's and include risk assessment considerations, including the likelihood and implications of detecting multiple constituents.