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State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
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JUDITH M. ESPINOSA  
SECRETARY

RON CURRY  
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September 23, 1994

Mr. Bill Hurlbut  
New Mexico/Federal Facilities Section  
Hazardous Waste Management Division  
US EPA Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

XII



**RE: New Mexico Environment Department approval with modifications of Cannon Air Force Base RFI Work Plan Landfill #5, SWMU #113.**

Dear Mr. Hurlbut:

Attached is the Joint Permitting Agreement formatted letter approving, with modifications the September 28, 1993 Cannon Air Force Base (CAFB) Draft RCRA Facility Investigation (RFI) Phase I Work Plan for Landfill #5, Solid Waste Management Unit (SWMU) #113. These comments are based on two previous revisions (replacement pages only) to the RFI work plan, dated February 16, 1994 and August 12, 1994.

These comments and modifications are provided in fulfillment of the HRMB's FY 93 and FY 94 Grant Work Plan Commitment to approve this RFI Work Plan for CAFB's Landfill #5.

If you have any questions, please telephone Ms. Lee Winn at (505) 827-4308.

Sincerely,

*Lee Winn for Ron Kern*

Ron Kern  
Manager, RCRA Technical Compliance Program

Attachment

cc Barbara Hoditschek, HRMB  
Lee Winn, HRMB  
Steve Pullen, HRMB  
CAFB 94 Red File  
RCRA TCP Reading File



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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Christopher S. Long, Colonel, USAF  
 Commander, 27th Support Group  
 100 S. DL Ingram Blvd., Suite 200  
 Cannon AFB, NM 88103-5217

Dear Colonel Long:

The Environmental Protection Agency (EPA) and New Mexico Environment Department (NMED) have reviewed your response dated August 12, 1994, to the Notice of Deficiency for the document entitled Cannon Air Force Base (CAFB) Draft RCRA Facility Investigation (RFI) Phase I Work Plan for Landfill #5, Solid Waste Management Unit (SWMU) #113.

The EPA and NMED hereby approve your RFI Phase I Work Plan with the enclosed modifications. The approved RFI Phase I Work Plan includes the work plan submitted on September 28, 1993, and the responses to the NMED Notice of Deficiencies submitted on February 16, 1994, and August 12, 1994. The RFI Phase I Report for Landfill #5 is now due on January 9, 1997. You shall initiate action immediately to assure compliance with the schedule in your work plan.

If you have any questions, please contact Mr. Bill Hurlbut at (214) 665-8305 or Ms. Lee Winn at (505) 827-4308.

Sincerely yours,

Kathleen Sisneros, Director  
 Water & Waste Mgmt. Division

Sincerely yours,

Allyn M. Davis, Director  
 Hazardous Waste Mgmt. Division

Enclosure

cc: Bill Hurlbut, EPA  
 Barbara Hoditschek, HRMB  
 Steve Pullen, HRMB  
 Lee Winn, HRMB  
 Ron Kern  
 CAFB 94 Red File

## ENCLOSURE

The following comments and modifications are provided concerning the Cannon Air Force Base Draft RCRA Facility Investigation (RFI) Phase I Work Plan for Landfill #5 Solid Waste Management Unit #113. This review was performed by the New Mexico Environment Department's Hazardous & Radioactive Materials Bureau. The first category includes general comments which are not specifically described in the RFI work plan but which are important in the continuing corrective action process. The second category describes specific modifications which must be incorporated into the text of the final approved RFI Phase I work plan.

### GENERAL COMMENTS:

The two most significant items which are not specifically addressed in the RFI work plan are:

- 1 During the May 19, 1994 meeting between CAFB and NMED, CAFB presented a facility-wide report on background metals entitled "Concentrations of Selected Naturally Occurring Chemical Constituents in Soil and Groundwater at Cannon Air Force Base, Clovis, New Mexico." CAFB proposed that this document be reviewed in support of background metals concentrations at SWMU #113. No determination of soil background metals concentrations have been specifically approved for this RFI Work Plan.
- 2 Regardless of what is determined during the Phase I or Phase II investigations, the necessity for ground water and/or vadose zone monitoring remains as a possibility.

### SPECIFIC MODIFICATIONS:

The following specific modifications must be incorporated into the text of the final approved RFI Phase I work plan. Items are listed by volume, section number, paragraph, and page. When applicable, the relevant text is quoted for clarification. Following the item, specific modifications are placed in quotations. Other modifications are described and the facility must determine the text changes which address these modifications.

NUMBER	ITEM
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|---|--|
| 1 | Vol. 1, section Preface, 1st paragraph, page 3. "Data generated from the geophysical survey and soil gas survey will be used to aid the locating of 30 soil borings to be drilled and sampled to document the presence or absence of contaminated leachate in the native soil beneath the landfill burial cell." |
|---|--|

Modification: The term "contaminated leachate" must be replaced by hazardous constituents.

2 Vol. 1, section 1, second bullet, page 1-2. **"Evaluate the data collected to identify potential migration pathways for future evaluation of human health and environmental risks (if required) associated with chemicals found in soils beneath Landfill No. 5."**

Modification: The term "soils" must be replaced by environmental media.

3 Vol. 1, section 3, figure 3-2. **Preliminary Exposure Pathway Flow Chart Landfill No.5 "Existing analytical data indicates no evidence of groundwater contamination due to past activities at Landfill No. 5."**

Modification: Because the ground-water monitoring system at Landfill No. 5 is not designed to monitor the entire landfill but specifically for Cell 3, it is unknown whether ground water contamination exists. The text must be modified to reflect the unknown impact because of lack of an adequate ground-water monitoring system.

4 Vol. 1, section 3, figure 3-2. **Preliminary Exposure Pathway Flow Chart Landfill No.5 "Potential Receptors"**

Modifications: Mechanisms must be in place to reevaluate land use and risk in the future or a residential land use must be used with the most conservative assumptions.

5 Vol. 1, section 4.3.3 1st paragraph, page 4-5. **"The subsurface soil samples collected will also be used to characterize the vertical distribution of contamination, so that the potential impact to groundwater can be addressed."**

Modification: The term "groundwater" must be replaced by environmental media.

6 Vol. 1, section 4.5.3, 2nd paragraph, page 4-12. **"The proposed RCRA Subpart S action levels, also presented in Tables 4-3 and 4-4, if exceeded, would also trigger a CMS."**

Modification: The RCRA Subpart S action levels are only examples. These action levels must be calculated using the most recent toxicological data from the Integrated Risk Information System (IRIS). If no IRIS data for a particular hazardous constituent is found, then the Health Effects Assessment Summary Tables (HEAST) should be utilized. If no HEAST data is

available, then CAFB should contact the EPA Environmental Criteria and Assessment Office (ECAO) for toxicological data. Sources of this toxicological data should be referenced along with the date of the reference for each hazardous constituent analyzed for at the landfill. Tables 4-3 and 4-4 must be revised to reflect these parameters. The Subpart S action levels are calculated for single constituents. A guideline approach for concentrations of multiple constituents which occur below action levels but within an order of magnitude of the action levels, is that each constituent should be mathematically normalized to determine if aggregate risk exceeds 1.

MEMORANDUM



TO: KATHLEEN SISNEROS, DIRECTOR, WATER AND WASTE MANAGEMENT DIVISION

THROUGH: *B/T* BENITO J. GARCIA, CHIEF, HAZARDOUS & RADIOACTIVE MATERIALS BUREAU

FROM: LEE WINN, SUPERVISOR, RCRA TECHNICAL COMPLIANCE PROGRAM *lw*

DATE: September 14, 1994

RE: JOINT EPA AND NMED APPROVAL OF CANNON AIR FORCE BASE'S RCRA FACILITY INVESTIGATION PHASED I WORK PLAN

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On February 10, 1992, NMED-HRMB asked for lead status in the Cannon Air Force Base (CAFB) RCRA Facility Investigation (RFI) for Solid Waste Management Unit #113 Landfill #5. Subsequently, on August 28, 1994, CAFB submitted a Draft Phase I RFI work plan to NMED for review. On November 29, 1993 a Notice of Deficiency (NOD) was issued on the RFI work plan. Afterwards, a number of meetings were conducted with the facility to clarify the requirements of the NOD. CAFB submitted revised pages for this work plan to satisfy the NOD requirements on two separate occasions. These revisions were approved with modifications in the attached letter.

The reason the letter requires joint signatures is that this protocol is outlined in the September 8, 1992 joint permitting agreement between the United States Environmental Protection Agency (EPA) Region 6 and the New Mexico Environment Department. Bill Hurlbut of the EPA provided me with an example of an approval letter which was used as a template. He reviewed this letter and requested the date be left off. It will be dated by the EPA when Allyn Davis signs it. If you have any questions, please telephone me at 827-4308. Thanks.