

M E M O R A N D U M

TO: DAVID DURAN, SOLID WASTE BUREAU
FROM: *LW* LEE WINN, HAZARDOUS & RADIOACTIVE MATERIALS BUREAU
DATE: OCTOBER 12, 1994
RE: DRAFT LETTER FROM CANNON AIR FORCE BASE ON CAFB
LANDFILL 5, CELL 3



With regard to the draft letter from Cannon Air Force Base (CAFB) concerning Landfill 5, Cell #3, the following items are incomplete and don't reflect the complexity of the situation at Landfill #5. Hopefully, this memorandum will provide more information concerning this site.

Item a. of this draft letter states that CAFB has a sufficient number of upgradient and downgradient ground-water monitoring wells. The reality is that the background (upgradient) well is not screened properly. CAFB has proposed in a draft Post Closure Care Plan to install a new background well. The downgradient wells have been accepted by NMED. This monitoring well system, when adequate, will be used to determine if a release of hazardous constituents occurs from Cell #3 only. The remainder of Landfill #5 is a HSWA solid waste management unit.

Item d. is accurate because unknown quantities and types of hazardous constituents were disposed of at this landfill. The HSWA directed RCRA Facility Investigation (RFI) requires an in-depth investigation of the landfill, including geophysics, soil vapor monitoring, and borehole sampling. Results of the RFI will be used to determine the need for monitoring wells around the entire landfill.

Items e-h. state that a regular ground-water monitoring program of sampling and analysis is in place. This is not exactly the case because CAFB is presently conducting monitoring following the schedule described in the attached letter. This sampling and analyses program provides monitoring data until an acceptable Post Closure Care Plan is in place. Afterwards, a year of quarterly sampling will be necessary to determine background ground-water quality. This statistical baseline data will then be used for comparison with subsequent monitoring results. It is true that no ground-water contamination has been detected in the downgradient monitoring wells. However, acetone was detected in the upgradient well in the late 1980's when the well was first installed. It was never detected subsequently, and its possible that acetone was a laboratory contaminant.

cc ✓ CAFB 1994 Red File
RCRA TCP CAFB File
Steve Pullen, NMED, DSMOA

File:1012cafb.mem



DEPARTMENT OF THE AIR FORCE

HEADQUARTERS 27th FIGHTER WING (ACC)
CANNON AIR FORCE BASE, NEW MEXICO

*Steph S ✓
Barbara ✓*

25 AUG 1993

FILE
CAFB
RED
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27 FW/CC
100 S DL Ingram Blvd Suite 100
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VIII

Ms Barbara Hoditschek
Program Manager, RCRA Permits
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
1190 St Francis Drive
PO Box 26110
Sante Fe NM 87502

RE: Cannon Air Force Base Landfill 5 Ground Water Monitoring

Dear Ms Hoditschek

Please find enclosed a summary of sampling results from ground water monitoring wells at Cannon AFB Landfill 5. These results are from sampling events which occurred between July 1992 and April 1993.

These results are being supplied in accordance with 40 CFR 265.92(c)(1) to establish initial background concentrations for this site. With these results Cannon AFB has established background concentrations. Therefore, we propose additional monitoring at Landfill 5 take place as follows. This sampling schedule will continue until directed otherwise by NMED.

First quarter 1994:

40 CFR 265 Appendix III constituents (*drinking water parameters*)
40 CFR 264 Appendix IX constituents
chloride, iron, manganese, phenols, sodium, sulfate
nitrate, nitrite, total dissolved solids, pH, specific conductance, total organic carbon, and total organic halogen *groundwater quality*

Third quarter 1994:

indicators of ground water contamination (pH, total organic halogens, total organic carbon, and specific conductance). *indicators parameters*

As discussed during telephone conversations with Mr John Pfeil (NMED) and Dr Janice Stowell (Cannon AFB) on July 20, 1993 and August 5, 1993, laboratory results (seven volumes) will be furnished to NMED upon request.

As we are proposing to eliminate the fourth quarter 1993 sampling event, we must have a response from your office by September 30, 1993 concerning the proposed sampling schedule. If we do not receive a response, we will assume that the proposed sampling schedule is satisfactory to NMED and will not implement a fourth quarter 1993 sampling event.

If there are any questions concerning this results summary, please contact Dr Janice Stowell at (505)784-4348.

Sincerely



LANCE L. SMITH, Colonel, USAF
Commander, 27th Fighter Wing

cc: Dave Morgan, NMED

