

HSWA CAFB Appendix F & III



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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

November 1, 1996

W.P. Ard, Colonel, USAF
Commander, 27th Support Group
100 S DL Ingram Blvd, Suite 200
Cannon Air Force Base NM 88103-5712



Dear Colonel Ard:

The following paragraphs contain a New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) summary of the status of the several documents you listed in your letter dated July 18, 1996:

a. **DP-33 Report sent February 95 awaiting approval:**

HRMB Response:

DP-33 is not a Resource Conservation and Recovery Act (RCRA) regulated unit, and is not on your operating permit list. Please contact Ms. Julie Jacobs of the New Mexico Environment Department Ground Water Quality Bureau for details. Ms. Jacobs may be reached at (505) 827-2776).

b. **RFI LF-3 SWMU # 105 and LF-4 SWMU # 104 Final RFI Report. The NOD on the Final Report was responded to on 24 August 1995.**

HRMB Response:

We have EPA comments on the RFI Report. HRMB will complete the review of these comments by the end of January 1997.

c. **LF-5, Cell 3 Post-Closure Care Plan submitted 25 January 1996 awaiting final approval. A new upgradient well is in use. You may want to review it with LF-5 SWMU # 113 RFI Report.**

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HRMB Response

Steve Pullen and Susan Hoines were concerned about the adequacy of the facility background study of metal concentrations in the vadose zone. NMED wanted the EPA to review the CAFB background study. When the EPA reviewed the background study they discovered discrepancies in the background study methodology and consequently wrote up one page of comments on the background study. NMED asked the EPA to fax a copy of the comments to CAFB on October 3, 1996. HRMB also asked CAFB to respond to the comments from the EPA. NMED needs to be assured the background study is adequate before we concur that the RFI report is acceptable.

If CAFB can justify its background study to NMED's satisfaction, then the RFI report will be adequate, and no further action will need to be done at the landfill other than the post-closure care ground water monitoring required by the permit for Cell 3. (It is NMED's hope that available data in CAFB's study will be all that is necessary, plus additional statistical calculations to establish the range of background concentrations for metals.

- d. *LF-1 SWMU # 74, Supplemental Work Plan submitted December 1995 awaiting approval along with the Work Plan for RFI. Steve Pullen gave his verbal approval in February 1996, and all the filed work is done. Draft Final RFI Report is nearly ready to be submitted but we have no written Work Plan approved.*

NMED Response:

Review of the work Plan has been completed by HRMB. The verbal approval given to CAFB as stated in item # d is all that is necessary.

- e. *Draft RFI Report for SWMUs 86-90 (SD-1) submitted in February 1996. Awaiting approval of no further action.*

HRMB Response:

HRMB received comments from EPA and will be reviewing them. This review will be completed before January 31, 1997.

- f. *Appendix II and III Phase II RFI Report (15 total SWMUs) submitted April 1995, NOD was responded to. Awaiting report approval.*

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HRMB Response:

HRMB received the EPA's comments and will review them, and make a final determination by the end of January 1997.

- g. **Awaiting approval of Work Plan for Appendix II and III SWMUs Interim Corrective Actions (19 oil/water separators).**

HRMB Response:

NMED received the EPA's comments on Work Plan. NMED sent CAFB an NOD on March 22, 1996 and have not yet received their response as well as a modified Work Plan from the Core of Engineers.

I hope the above responses have satisfactorily answered your questions on the SWMUs under discussion. If you have further questions on any of the above items, please contact Mr. Cornelius Amindyas at (505) 827-1561.

Sincerely,


Benito Garcia, Chief
Hazardous and Radioactive Materials Bureau

cc: Dave Neleigh, Chief, EPA Region VI (6PD-N)
Jerry Bober, HRMB
Steve Pullen, HRMB
Susan Hoines, HRMB
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