



GARY E. JOHNSON
GOVERNOR



State of New Mexico
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December 19, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Michael J. Koerner, Colonel, USAF
Commander
100 S DL Ingram Blvd, Suite 100
Cannon Air Force Base (CAFB), NM 88103-5214

Dear Col. Koerner:

The New Mexico Environment Department (NMED) has reviewed CAFB's Preliminary Assessment/Site Investigation (PA/SI) Work Plan (WP) for the Area of Concern (AOC)-D, submitted to the Hazardous and Radioactive Materials Bureau (HRMB) in draft form and dated February 1996. NMED understands that this site is commonly referred to as the "asbestos landfill".

This site is currently not on CAFB's Resource Conservation and Recovery Act (RCRA)/Hazardous and Solid Waste Amendments (HSWA) Permit as a Solid Waste Management Unit (SWMU). NMED believes this is an oversight of CAFB's permit requirements, specifically Section E., NOTIFICATION REQUIREMENTS FOR AND ASSESSMENT OF NEWLY-IDENTIFIED SOLID WASTE MANAGEMENT UNIT(S). Because CAFB has submitted this plan for approval and NMED believes it is in fact a SWMU, NMED will treat the site as a SWMU and respond accordingly.

Therefore, NMED will approve the WP effective ten (10) days of NMED's receipt of the required corrections. For SWMU WPs, CAFB's RCRA/HSWA Permit requires in Section P., MODULE IV SUBMISSION SUMMARY, that the attached comments be addressed and modifications be made in a revised WP within thirty (30) days of CAFB's receipt of this correspondence.

If contamination is detected during this investigation, CAFB must submit a Class I permit modification application to incorporate this site as a SWMU into its permit. The time required for this submittal is also stipulated within Section P. the HSWA permit.

Furthermore, CAFB should evaluate whether AOCs E and F, the Rubble Pile and the Bore Site Mound respectively, or any other release site, should be incorporated into its HSWA permit as a SWMU.

Michael J Koerner
December 19, 1996
Page 2

If you have any questions, please contact Mr. Steve Pullen or Mr. Carl Will my staff for technical or permitting questions respectively, or myself.

Sincerely,


Robert S. (Stu) Dinwiddie, Manager
RCRA Permits Management Section
Hazardous and Radioactive Materials Bureau (HRMB)

Attachment

xc: (w/Attachment)
Marcy Leavitt, Chief, GWQB
Steve Pullen, HRMB
Carl Will, HRMB
David Neleigh, EPA
John Constantine, CAFB

Michael J Koerner
December 19, 1996
Page 3

ATTACHMENT

REQUIRED MODIFICATIONS AND COMMENTS
DRAFT WORK PLAN FOR SITE INSPECTION
AREA OF CONCERN D
CANNON AIR FORCE BASE NM7572124454

Section 2.2.1 Site Investigation. In the last paragraph on page 2-2, and the second paragraph on page 2-4, petroleum hydrocarbon constituents should be listed as a potential contaminants.

Section 3.2.3.1. Asbestos Containing Debris. This section states that the USACE-TM will be contacted for instructions regarding drilling and sampling below 10 feet if no visible asbestos containing material is encountered in the first 10 feet. CAFB must describe how the presence or absence of any other organic or inorganic contaminants at depth will be determined?

The following two SOPs are contradictory.

- SOP No.6 Section 5.2 Drill Cuttings. Soil cuttings determined to be nonhazardous may be placed back into the borehole ...

- SOP No.11 Section 3.0 Procedure For Borehole Abandonment. Upon completion of soil sampling and advancement of the boring to its predetermined depth, the soil boring will be abandoned immediately unless saturated conditions are encountered. All boreholes to be abandoned, regardless of depth, will be grouted to 3 feet below ground surface, and clean soil used to complete the fill to surface.

NMED believes that the most environmentally sound practice is to plug all boreholes below three feet with inert materials of less than or equal permeability than the natural soils. Therefore, SOP No.11 should be the procedure followed and SOP No.6 should be eliminated.