

FILE: HSWA / CAFB / LANDFILLS 3 & 4  
TRACK: CAFB / 3/26/97 / KOERNER / DIVISION / LANDFILLS 3 & 4 R51

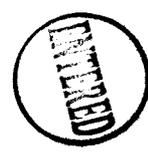


GARY E. JOHNSON  
GOVERNOR

State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
Hazardous & Radioactive Materials Bureau  
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SECRETARY  
EDGAR T. THORNTON, III  
DEPUTY SECRETARY



**Certified Mail**  
**Return Receipt Requested**

March 26, 1997

Michael J. Koerner, Colonel, USAF  
Commander  
100 S DL Ingram Blvd., Suite 100  
Cannon Air Force Base, NM 88103-5714

**Subject:** Request for Additional Information:  
Phase II RCRA Facility Investigation Report  
Landfills Nos. 3 and 4 (SWMU Nos. 105 and 104/IRP Nos. LF-3 and LF-4)  
Project CZQZ 91 7006  
Cannon Air Force Base

Dear Colonel Koerner:

The Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department (NMED) has reviewed the above-referenced Report, dated March, 1995, as required under the New Mexico Hazardous Waste Management Regulations.

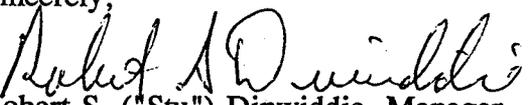
HRMB has comments on the Phase I RFI Reports for both landfills which must be addressed in order for us to complete our review. These comments are enclosed as Attachment A.

Your response to these comments must be received by NMED within thirty (30) calendar days of receipt of this letter.

Colonel Koerner  
March 26, 1997  
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If you have any questions please contact Carl Will of my staff at 505-827-1561.

Sincerely,

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

Attachment

cc: Jerry Bober, HRMB  
Steve Pullen, HRMB  
Carl Will, HRMB  
David Neleigh, EPA Region 6  
Bob Sturdivant, EPA Region 6

## ATTACHMENT A

### COMMENTS ON CAFB PHASE II RCRA FACILITY INVESTIGATION REPORT, LANDFILLS NOS. 3 AND 4

March 26, 1997

#### 1.2 Purpose and Scope of Report

The scope of the Report is limited to analysis of whether groundwater is impacted by the sites. However, no adequate eco-risk analysis has been done. The Phase I RFI Reports state that pesticides, herbicides, PCB's and other bioconcentrators were released from the landfills, including up to 670 ppb DDT at 15 feet underneath Landfill No. 4, and that there is potential exposure of wildlife to contaminants originating at the landfills via surface water flowing downgradient to the playa lake. An analysis must be completed to determine the probability of contaminants, including DDT and its derivatives, at existing concentrations and depths being transported to the surface of the landfills by evapotranspiration, soil-dwelling animals, or other mechanisms, and the probability of contaminant concentrations being transported to the playa lake via surface water run-off, shallow groundwater flow, or other mechanisms. Adequate analysis of transport of contaminants may require, among other things, additional sampling to more fully characterize existing concentrations and locations of contaminants, sampling or modeling to determine contaminant concentrations and surface water flow, and sampling of shallow groundwater to determine contaminant concentration levels and groundwater flow towards the lake.