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May 15, 1997

Russ MacRae  
U.S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM 87113-1001

Subject: Cannon Air Force Base Playa Lake - Ecological Risk Information

Dear Mr. MacRae:

As we discussed on the phone, enclosed for your information are copies of the following documents related to the above-referenced site:

1. Baseline Risk Assessment dated February, 1994;
2. the section addressing the playa lake from HRMB's Notice of Deficiency for the CAFB RCRA Facility Investigation Report.

I included the whole playa lake section from the BRA. Eco-risk is addressed beginning at page 12-15. The NOD has not yet been issued, and there could be changes made to the final version. I hope to send it out within the next couple of weeks.

I appreciate your time in looking at this. Let me know if you have any comments or questions or would like additional information.

Sincerely,

Carl Will  
Environmental Scientist

Enclosures

cc: Jerry Bober

file: HSWA/CAFB/Appendix II & III  
track: CAFB/5-15/MacRae/Will/playa lake eco-risk document transmittal

biomagnification to the highest trophic level for contaminants above benchmark levels. In the alternative, submit a CMS for removal of the contaminants to below benchmark levels. TRPH at 9,700 in surface soil may warrant removal under state action levels.

Include an assessment of additive risk.

**10.7.2. Comparison of Phase II Concentrations to Phase I Concentrations and RBC's**

Include the text on reporting limits agreed to in the CAFB response to EPA's NOD, dated December 20, 1995.

**11.0. Playa Lake - SWMU No. 103**

**11.1.5. Previous Investigations**

**11.8. Summary and Recommendations**

The Report states that the ecological risk assessment showed that there could be a potential for ecological risks to predatory birds, but the actual level of risk is unknown. The February, 1994, BRA did not include pesticides or PCB's as COC's. The April, 1996, ecotoxicological screening of sediment concentrations uses mallard ducks as the surrogate receptor for pesticides. Submit an eco-risk analysis that accounts for biomagnification to the highest trophic level, for example raptors that feed on ducks, for pesticides, PCB's, and other contaminants over benchmark levels. The April, 1996, screening references Region III industrial soil RBC's. Human health RBC's are not appropriate in conducting the environmental risk assessment. Sediment quality criteria do not account for bioaccumulation.

Assess additive risk.

**12.0. Landfill No. 25 - SWMU No. 97**

**12.7.1. Comparison of Groundwater Concentrations Detected in MW-K with RBC's**

Include the text on reporting limits agreed to in the CAFB response to EPA's NOD, dated December 20, 1995.

**12.8. Summary and Recommendations**

The Report recommends that one additional sample for VOC analysis be collected. More than one round of sampling is required to determine if