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Certified Mail
Return Receipt Requested

June 25, 1997

Michael J. Koerner, Colonel, USAF
Commander
100 S DL Ingram Blvd., Suite 200
Cannon Air Force Base, NM 88103-5214

Subject: Notice of Deficiency (NOD): Technical Adequacy, Cannon Air Force Base (CAFB) Phase I RCRA Facility Investigation Report (Report) for Landfill No. 1 (SWMU No. 74)
EPA ID No. NM7572124454

Dear Colonel Koerner:

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

After reviewing the Report, the NMED has found the Report to be technically deficient. The deficiencies that must be addressed before NMED can declare the Report technically adequate are described in Attachment A.

A schedule for submittal of the revised Report must be submitted to NMED within thirty (30) days of receipt of this NOD. Failure to submit the required information in this designated time may result in issuance of a Letter of Disapproval of the Report.

Colonel Koerner
June 25, 1997
Page 2

If you have any questions please contact Carl Will of my staff at 505-827-1561.

Sincerely,


Benito Garcia, Chief

Hazardous and Radioactive Materials Bureau

Attachment

cc: Jerry Bober, HRMB
Carl Will, HRMB
David Neleigh, EPA Region 6
Bob Sturdivant, EPA Region 6
John Pike, CAFB (via fax)

file: HSWA/CAFB/3

track: CAFB/6-25-97/Koerner/Garcia/L1 RFI Report NOD

ATTACHMENT A

NOTICE OF DEFICIENCY:

**TECHNICAL ADEQUACY REVIEW OF PHASE I RCRA FACILITY INVESTIGATION
REPORT FOR LANDFILL NO. 1, SUBMITTED BY CANNON AIR FORCE BASE,
NEW MEXICO**

June 25, 1997

3.0. Field Investigation Objectives, Methods and Results
3.2.3. Subsurface Soil Investigation

Page 3-11, paragraph 3, sentence 1, states that soil cuttings were placed in drums and transported to the designated drum staging area. State how the Investigation Derived Waste was characterized and disposed of.

4.0. Nature and Extent of Contamination

In Table 4-19, concentrations of Total Petroleum Hydrocarbons are incorrectly expressed in ppb. Change the units to ppm.

5.0. Contaminant Fate and Transport

5.3. Contaminant Persistence

5.3.1. Volatile Organic Compounds and Herbicides

On page 5-9, the Report states that toluene has a half life of from 4 to 22 days and 2-(2-methyl-4-chlorophenoxy) propionic acid (MCCP) has a half life of from 7 to 10 days. Both constituents were detected in subsurface soil samples at the site. Section 2.1.2., History of Use, of the Report, states that the site received waste from 1943 to 1946. Explain why constituents that biodegrade in a short time period are present if the landfill stopped receiving waste fifty years ago.

7.0. Relevant and Appropriate Standards

Table 7-2 states that two federally listed endangered species are known to inhabit the area. Include the names of those endangered species.