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

September 19, 1997

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

Subject: Cannon Air Force Base (CAFB) Phase III RCRA Facility Investigation Report  
(Report) for SWMU's 86-90 (the Site);  
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 HRMB has found the Report to be technically adequate and approves the Report. However, the HRMB has determined that a Corrective Measures Study (CMS) must be submitted to determine the most effective means of reducing TPH levels in soil to under 1,000 ppm, the HRMB cleanup level for TPH. TPH was detected at the Site at up to 5,390 ppm.

The CMS should address the following issues from the RFI Report. Issues regarding the extent of contamination must be resolved in the CMS in order to accurately determine how the site is to be remediated.

The horizontal extent of contamination has not been determined.

Col. Koerner  
September 19, 1997  
Page 2

Insufficient information is provided regarding residual contamination below SWMU's 87 and 89, the former leach field and the evaporation pond respectively. These SWMU's were constructed to discharge hazardous constituents to the vadose zone. Section 4-3 suggests that previous investigations may have either incorrect or inadequate soil analytical information for these SWMU's. For example, B-1(Walk, Haydel) was drilled in the vicinity of 0868 (WCC) and failed to detect the high concentrations of acetone and TPA and possibly other constituents. This information calls into question the data from B-2 through B-5 (Walk, Haydel), which were the primary boreholes associated with SWMU's 87 and 89. CAFB should identify all data gaps and fill those gaps.

Explain the discrepancy between the statement in section 9.1, at page 9-1, line eight, that the depth of backfill is about 15 feet at its deepest point, and the statement at page 4-5, line 25, that the excavation depth was 25 feet.

Not all SWMU's included in the RFI Report are shown on Figure 4-2. The previous investigations should be discussed by SWMU number with a separate map for each SWMU.

Provide a groundwater gradient map showing groundwater flow direction and rate.

A draft CMS Plan must be submitted to HRMB within ninety (90) calendar days of receipt of this letter.

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

Sincerely,

  
Robert S. ("Stu") Dinwiddie, Ph.D., Manager  
RCRA Permits Management Program

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

file: HSWA/CAFB/7  
track: CAFB/9-19-97/Koerner/Dinwiddie/SWMU's 86-90 RFI Report Approval