



*CAF B98*

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

August 17, 1998



Mr. Benito Garcia, Chief  
Hazardous and Radioactive Materials Bureau  
New Mexico Environment Department  
P.O. Box 26110  
Santa Fe, N.M. 87502

Re: Proposal for Changes in Long Term Monitoring at Landfills 3, 4, and 25 at Cannon AFB,  
Proposal to sample monitor wells C and J at Landfill 5 on a temporary basis

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has completed a review of the following Cannon Air Force Base documents at the request of Mr. Carl Will of your staff.

Regarding the proposal for Changes in Long Term Monitoring at Landfill 3 (SWMU 105), Landfill 4 (SWMU 104), and Landfill 25 (SWMU 97) dated January 6, 1998. The sampling interval changes from quarterly to semi-annual at Landfill 25 (SWMU 97), and the change from semi-annual to annual sampling at Landfill 3 (SWMU 105), and Landfill 4 (SWMU 104) are acceptable. Citing the lack of detection and low mobility of the compounds, the proposal calls for annual sampling and analysis of VOCs, SVOCs, Metals, Pesticides, PCBs, and Herbicides. Appendix IX analysis would be performed every 3 years. Using the Octanol/Water Partition Coefficient ( $K_{ow}$ ) of +3.2 as an indicator of low mobility, the Chemicals of Potential Concern (COPCs) should be reviewed. Addition of the Water Quality Indicator Parameters ( Sulphates Nitrates, Nitrites, pH, Conductivity, Chlorides, Phenols, Sodium, Iron, Magnesium), and deletion of the following parameters (Dioxin, Cyanide, Sulfide, Total Organic Carbon, Total Organic Halide) is acceptable. The EPA believes the proposed changes to the long term monitoring program at SWMUs 105, 104, and 97 will not have a negative impact on human health and the environment.

Regarding the proposal to use alternate ground water detection wells at Landfill 5 (SWMU 113) dated February 23, 1998. The hydrogeologic data submitted shows a declining ground water surface elevation of 15 feet in 5 years at Wells L and M, which places the water levels below the well screens. The proposal calls for sampling wells C and J, which are screened lower in the water table. Sampling of the substitute wells will be temporary until 2 new replacement wells scheduled for FY 99 are completed. The use of alternate wells to offset regional decline in ground water levels should result in higher quality samples for analysis. The 2 new wells scheduled for FY99 offset the loss of wells L and M, and normalize the detection monitoring program at SWMU 113.

If you have any questions, please contact Bob Sturdivant of my staff at (214) 665-7440.

Sincerely,

  
David Neleigh, Chief  
New Mexico and Federal Facilities Section

cc: Carl Will  
New Mexico Environment Department