



**GARY E. JOHNSON**  
GOVERNOR

*State of New Mexico*  
**ENVIRONMENT DEPARTMENT**

*Hazardous Waste Bureau*  
2044 A Galisteo, P.O. Box 26110  
Santa Fe, New Mexico 87502-6110  
Telephone (505) 827-1557  
Fax (505) 827-1544



**PETER MAGGIORE**  
SECRETARY

**PAUL R. RITZMA**  
DEPUTY SECRETARY

**MEMORANDUM**

TO: Gedi Cibas

CC: James Bearzi  
John Kieling

FROM: Glenn von Gonten

SUBJECT: NMED FILE NO.: 1489 ER ADDENDUM  
DEA: CANNON AIR FORCE BASE, DEFENSIVE TRAINING  
INITIATIVE  
JULY 2001

DATE: October 31, 2001

HWB has the following comments on CAFB's September 25, 2001 Response to NMED's September 5, 2001 comments on CAFB's DEA.

1. In general, CAFB should revise the DEA to include the responses that they submitted to NMED on September 25, 2001. Discussion alone is inadequate; CAFB should include in a revised DEA all appropriate discussion on the topics raised by NMED.
2. HWB reiterates our previous comment that the DEA should discuss the applicability of RCRA, the HWA, and their Operating Permit at Melrose Air Force Range to their proposed actions for completeness. CAFB should provide an overview of their permits and why they feel that New Mexico statutes and/or regulations either do or do not apply.
2. Flares and chaff will indeed be used for their "intended purpose" during training exercises. CAFB should include the discussion that they provided in their September 25, 2001 response letter in their revised DEA. Specifically CAFB should restate why they feel that malfunctioning flares and chaff do not pose an "imminent and substantial endangerment" when they land off-range.
3. Although CAFB's EA indicates that the Air Force has authorized "alternative" formulations that do not use (potassium perchlorate, CAFB does not specify in the DEA that the

Gedi Cibas  
August 17, 2001  
Page 2

"authorized" formulations will actually be used exclusively in New Mexico. CAFB should revise the DEA appropriately.

4. CAFB has not adequately addressed HWB's question 5. We reiterate that "CAFB should more completely address the results of the studies conducted on the ingestion effects of chaff on animals. On page 4-16 CAFB states that cattle and goats avoided eating chaff, but does not discuss what happens when cattle and goats actually consumed chaff with their feed. CAFB should either provide the toxicological study or more completely address the results of the study. One of the attached letters (from Bill and Peggy. Haverlah) indicates that the Air Force has stated in some forum that "...prolonged inhalation of chaff fibers cause respiratory inflammatory response." CAFB should address all potential pathways to the environment including ingestion, inhalation, dermal contact, etc." CAFB's response to HWB's comments should be included in their revised DEA.