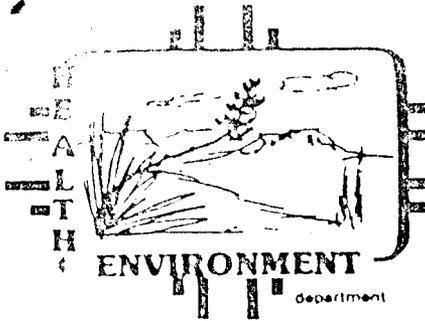


CAF B 84

TONY ANAYA  
GOVERNOR

DENISE D. FORT  
DIRECTOR



STATE OF NEW MEXICO

ENVIRONMENTAL IMPROVEMENT DIVISION

P.O. Box 968, Santa Fe, New Mexico 87504-0968  
(505) 984-0020

December 19, 1984

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

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Mary N. Turner, Colonel, U.S.A.F.  
Commander  
Headquarters 27th Combat Support Group (TAC)  
Cannon Air Force Base, New Mexico 87101

Dear Colonel Turner:

This letter is in response to your letter, dated 29 November 1984, to Denise Fort, Director of the New Mexico Environmental Improvement Division (EID). Your letter was in response to EID's Notice of Violation (NOV) at Cannon Air Force Base (AFB) of the ground-water monitoring requirements of the New Mexico Hazardous Waste Management Regulations (HWMR-2). You requested written approval of your well sitings, and you provided a tentative schedule for completion of the wells and water sampling.

Regarding Approval of the Well Sitings: The Interim Status ground-water monitoring requirements of HWMR-2 (Section 206.C.1) are self implementing. That is, it is the responsibility of the facility to install wells that are capable of immediately detecting any impact of the hazardous waste facility on the uppermost aquifer beneath the facility; no EID approval of the well sites is required. If review of data from the wells indicate that the criteria of Section 206.C.1. are not being met, EID can cite the facility and require compliance through the installation of new wells.

Although it is not our prerogative to approve the well sites, we do think that it is prudent of you to ask our advice prior to drilling, and we appreciate the opportunity to make comments. Based on the data submitted to date, it is our opinion that the proposed well sites will be adequate to meet the requirements of Section 206.C.1. You should be aware, however, that there is the potential for future data to indicate otherwise. For example, water level data from the installed wells might show that the gradient is in a different direction than has been assumed, so that additional wells may be necessary. Ms. Claassen explained these caveats in her conversation with Lt. Walton on November 20, 1984.

Mary N. Turner, Colonel, U.S.A.F.

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Regarding the Drilling Schedule: We appreciate your immediate actions to respond to the NOV by beginning the well drilling. But inasmuch as the ground-water monitoring program is not yet implemented, Cannon AFB remains in violation of Section 206.C.1 of HWMR-2. Under the circumstances, the schedule you provided for completing the wells appears reasonable. To ensure that there are no further delays, we will draw up a Compliance Schedule based on the schedule you provided. The Compliance Schedule will be available to be discussed at our December 20, 1984 meeting.

Thank you for your efforts to date to come into compliance with the ground-water monitoring requirements. We particularly appreciate the detailed information provided by Radian Corp. If you have any questions regarding this letter, please feel free to contact Ms. Ann Claassen at (505) 984-0020, Ext. 340.

Sincerely,



Peter H. Pache  
Program Manager  
Hazardous Waste Management Section

PHP/AC/mp

xc: Susan Stark, EPA Region VI  
Duff Westbrook, EID Legal Bureau  
John Guinn, EID District IV  
Jim Richards, Cannon AFB