



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 27TH COMBAT SUPPORT GROUP (TAC)
CANNON AIR FORCE BASE, NM 88103

*file KAFB
Red 85*

ENTERED

15 MAR 1985

Peter H. Pache, Program Manager
Hazardous Waste Section
P.O. Box 968--Crown Building
Santa Fe, NM 87504-0968

Dear Mr Pache

Attached is our reply to the Compliance Order/Schedule which you forwarded to us in your letter of February 13, 1985. If you have any questions about this reply, please do not hesitate to contact our Chief of Environmental Planning, Capt Peter Robles (505-784-2739).

Mary N. Turner

MARY N. TURNER, Colonel, USAF
Commander

1 Atch
Response to Compliance
Order/Schedule

cc: AFRCE
HQ TAC/DEEV

*Jim Richards
will call on
Part A - 4-10-85*

*@ 10 AM He call
OK! - 4/11/85
JE*

RECEIVED

MAR 19 1985

HAZARDOUS WASTE SECTION

ENVIRONMENTAL IMPROVEMENT DIVISION

IN THE MATTER OF:

Cannon AFB
Cannon AFB, New Mexico
EPA ID #NM7572124454

Docket Number
NMHW 001003
COMPLIANCE ORDER/SCHEDULE

Complainant, the Director of the New Mexico Environmental Improvement Division (EID), determined that the Respondent, Cannon Air Force Base, was in violation of the New Mexico Hazardous Waste Act and regulations promulgated thereunder and, after a discussion with Respondent, issued a Compliance Order/Schedule that was forwarded to Respondent on 13 February 1985 and received by Respondent on 14 February 1985. Respondent now submits the following reply in response to each specific requirement of that Compliance Order/Schedule:

A. RESPONDENT WAS REQUIRED TO SUBMIT A WASTE ANALYSIS PLAN THAT MEETS THE REQUIREMENTS OF SECTION 206.B.3 OF THE NEW MEXICO HAZARDOUS WASTE MANAGEMENT REGULATIONS (NMHW) AND WHICH ANSWERS THE VIOLATIONS CITED IN THE NOVEMBER 30, 1984 COMPLIANCE ORDER AND SATISFIES THE COMMENTS SUBMITTED BY EID IN THE EID LETTER OF 5 FEB 85.

REPLY: Respondent's revised Waste Analysis Plan is attached (Atch 1). Respondent believes this Plan complies with this requirement.

B. RESPONDENT WAS REQUIRED TO SUBMIT A PERSONNEL TRAINING PROGRAM THAT APPLIES TO RESPONDENT'S ENTIRE FACILITY, MEETS THE REQUIREMENTS OF SECTION 206.B.6 OF THE NEW MEXICO HAZARDOUS WASTE MANAGEMENT REGULATIONS, ANSWER THE VIOLATIONS CITED IN THE NOVEMBER 30, 1984 COMPLIANCE ORDER AND SATISFIES THE COMMENTS SUBMITTED BY EID RESULTING FROM A REVIEW OF SAMPLE DOCUMENTS SUBMITTED BY RESPONDENT.

REPLY: Respondent has a personnel training program for civilian employees and military personnel engaged in process hazardous wastes. This program consists of 8 hours of classroom instruction (as well as on-the-job training) provided to personnel at each accumulation point and TSD facility, and is designed to teach such persons how to perform their duties in a way that ensures Respondent's compliance with the requirements of Sections 206.B.6C and 206.D of the NMHW Regulations. More specifically,

(1) The Program is directed by Lt Brubaker, a person who has been trained in hazardous waste management procedures. Lt Brubaker has received specialized training in hazardous waste management procedures. He is a graduate of the Hazardous Waste Facility Operators Course given by the Naval Environmental Protection Support Service (NEPASS) on 25 May 1984. A copy of his Certificate of Completion from this course is attached (Atch 2).

(2) The instruction program is designed to teach facility personnel hazardous waste management procedures relevant to the positions.

(3) The training program covers laws, regulations, accumulation point management, handling of hazardous materials, contingency plan/emergency response and personnel safety. The instruction teach facility personnel to

respond effectively to emergencies by identifying initial response activities and familiarization with emergency spill procedures. This course is conducted quarterly and/or more frequently if necessary. A copy of the Hazardous Waste Management Training Program, Oil and Hazardous Substance Spill Prevention and Response Plan, and the Hazardous Waste Management Plan are attached (Atch 3).

*HW
mgt.
flow not
found as
of 3/24/88
AG Gordon*

C. RESPONDENT IS REQUIRED TO SUBMIT CERTIFICATION THAT IT IS MAINTAINING A COMPLETE OPERATING RECORD FOR THE ENTIRE FACILITY AT MR. JAMES RICHARD'S OFFICE AND THAT THIS RECORD WILL BE UPDATED ON A QUARTERLY BASIS WITH ALL REQUIRED DATA FROM EACH COMPONENT OF THE FACILITY. THE OPERATING RECORD IS REQUIRED TO MEET THE REQUIREMENTS OF SECTION 203.C.2.c OF THE NMHWM REGULATIONS.

REPLY: The required certification is attached (Atch 4).

D. RESPONDENT IS REQUIRED TO SUBMIT AN INSPECTION SCHEDULE WHICH MEETS THE REQUIREMENTS OF SECTION 203.C.2.c AND SECTION 206.B.5 OF THE NMHWM REGULATIONS AND TO CONDUCT ALL REQUIRED INSPECTIONS.

REPLY: A copy of Respondent's inspection schedule is attached (Atch 8). A copy of each site's inspection log is also attached (Atchs 5, 6, 7). Respondent is currently conducting all required inspections.

E. RESPONDENT IS REQUIRED TO SUBMIT A REVISED PART A PERMIT APPLICATION REFLECTING EACH TREATMENT, STORAGE AND DISPOSAL OPERATION SINCE 19 NOV 1980.

REPLY: A revised Part A is attached (Atch 9).

F. RESPONDENT IS REQUIRED TO HAVE COMPLETED ALL GROUND WATER MONITORING WELLS BY 15 FEBRUARY 1985.

REPLY: All wells were completed and pumps installed by 23 Jan 85.

G. RESPONDENT WAS REQUIRED TO HAVE TAKEN THE FIRST SET OF SAMPLES FROM THE MONITORING WELLS BY 22 FEBRUARY 1985.

REPLY: Respondent collected samples from the 4 monitoring wells on 24 and 25 Jan 85 and shipped these samples for analysis.

H. RESPONDENT IS REQUIRED TO HAVE THE SAMPLES FROM THE MONITORING WELLS ANALYZED AND THE RESULTS OF THAT ANALYSIS SENT TO EID FOR RECEIPT BY EID NO LATER THAN 30 APRIL 1985.

REPLY: We do not anticipate any difficulty in submitting the results of the analysis of water from these wells to EID for receipt by EID on or before 30 April 1985.