



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION VI  
INTERFIRST TWO BUILDING, 1201 ELM STREET  
DALLAS, TEXAS 75270



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April 30, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Colonel Mary N. Turner  
Commander  
Cannon Air Force Base  
27CSG/DE  
Cannon Air Force Base, New Mexico 88103

Red File

RE: Cannon AFB  
EPA I.D. Number NM7572124454  
Incomplete Part B Permit Application

Dear Colonel Turner:

On June 17, 1985, the Environmental Protection Agency (EPA), Region 6, received additional information for your Resource Conservation and Recovery Act (RCRA) Part B permit application. These additions were required as a result of the Hazardous and Solid Waste Amendments of 1984 (HSWA).

The State of New Mexico is authorized to operate a hazardous waste management program for those portions of RCRA in effect prior to the enactment of the HSWA. The HSWA impose additional requirements on hazardous waste management facilities which will be administered and enforced by the EPA until the New Mexico Environmental Improvement Division (NMEID) receives additional authorization for these requirements. Therefore, both the NMEID and the EPA will determine whether to issue a permit to Cannon AFB. Hereinafter, EPA's portion of your RCRA permit will be referred to as your HSWA permit.

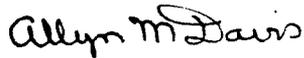
Your application has been reviewed for completeness as required by 40 CFR 124.3. Based upon this review, the permit application has been determined to be incomplete for the requirements of the HSWA.

The permit application did not adequately or fully address the requirements of 40 CFR 270 (48 FR 14146, April 1, 1983, formerly 40 CFR 122) and 40 CFR 264 for issuing a hazardous waste management permit. These deficiencies are detailed in the enclosed Notice of Deficiency.

Please submit to EPA one (1) original and two (2) copies of Revision 1 of your Part B permit application submitted on or about October 28, 1985, to the NMEID and any subsequent submissions to the NMEID, within 30 days of receipt of the Notice of Deficiency. Also, please submit one (1) original and two (2) copies of the information required to respond to the enclosed deficiencies to EPA and one (1) copy to NMEID within 30 days of receipt of the Notice of Deficiency. If you fail to comply with the requirements of this warning letter, further enforcement action or a proposal to deny your RCRA permit may be initiated, both of which may result in termination of interim status for your RCRA facility.

If you have any questions regarding the Notice of Deficiency, please contact me, or have your staff contact Steven Rubin at the Environmental Protection Agency (6H-CP), 1201 Elm Street, Dallas, Texas 75270, or call (214) 767-8941.

Sincerely yours,

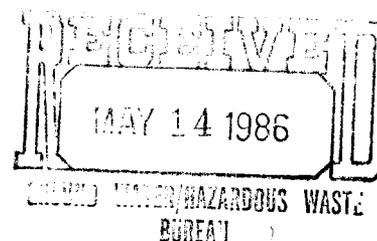


Allyn M. Davis  
Director  
Hazardous Waste Management Division

Enclosure

cc: Peter Pache  
New Mexico Environmental  
Improvement Division

Notice of Deficiency  
Cannon Air Force Base  
NM7572124454  
April 15, 1986



General Comments (Regulatory requirement 40 CFR 264.101)

1. It is apparent, after review of the June 13, 1985, Part B submission, that a misunderstanding exists regarding solid waste management units (SWMU) which are regulated under the RCRA for corrective action of releases at such SWMUs. In the letter and certification signed by Colonel Mary Turner, Cannon Air Force Base (CAFB) reported only 4 SWMUs. A file review by EPA to verify the submission revealed at least 41 SWMUs which are under the jurisdiction of RCRA regarding corrective action for releases from these SWMUs. Also, the letter indicated that CAFB knew of no releases, the file review indicated the CAFB knows of releases at the facility from these SWMUs.

A SWMU is defined as any unit, which, at a minimum, includes any landfill, surface impoundment, waste pile, land treatment unit, incinerator, tank (including storage, treatment, and accumulation tanks), container storage units, injection wells, wastewater treatment units, elementary neutralization units, transfer stations, and recycling units, that have received, or receive, solid or hazardous waste at any time.

A release is defined as any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposal into the environment.

2. In the June 13, 1985, letter, CAFB indicated that Phase II of the Installation Restoration Project (IRP) would be made available for our review in October 1985. This document was not forwarded to the EPA Hazardous Waste Compliance Branch, and a file review revealed that this document was not in the RCRA or CERCLA files. CAFB needs to submit copies of Phase II of the IRP and any results which have been obtained. CAFB also needs to submit information regarding Phase III and IV of the IRP that have been proposed or completed.
3. The files which were reviewed included proposed groundwater monitoring well construction parameters and material specifications. The proposed wells are not acceptable for groundwater monitoring for the reasons provided below. The basis for the inadequacy of the proposed wells is that most releases at CAFB will be oil, fuel, solvents, and other organics.
  - (a) The proposed wells are constructed of PVC, which will absorb organics and not allow for representative sampling.

- (b) The proposed wells are screened throughout the entire thickness of the High Plains Aquifer. Below CAFB the aquifer is approximately 100 feet thick. This screen length provides for a substantial amount of dilution of the sample taken. As a result, the samples taken will not be representative.
- (c) The proposed well screen begins 15 feet below the groundwater table. As a result, samples will not detect any hydrocarbons floating on the water table.

EPA recommends that CAFB modify the construction parameters and material specifications for the proposed monitoring wells. If these wells have been constructed, CAFB will need to install new wells which meet the required specifications for monitoring the groundwater to detect contamination from the type of releases which are expected at CAFB.

- 4. The HSWA and 40 CFR Part 270.10(j) require that all facilities pursuing RCRA permits for surface impoundments submit exposure information for those units. CAFB failed to submit the required information on November 8, 1985. CAFB needs to provide the required exposure information. CAFB was issued guidance on developing this information on June 21, 1985.

#### Specific Comments (Regulatory requirement 40 CFR 264.101)

- 1. CAFB needs to modify Appendix B-1, Topography Map from the February 14, 1985, Part B application to include the locations of all solid waste management units in this area of CAFB. This includes the following units and any additional units located in this area of CAFB.
  - Landfill No. 1 (Site 1),
  - Blown Capacitors Site (Site 10),
  - Sanitary Sewage Lift Station Overflow (Site 13), and
  - AGE Drainage Ditch (Site 15).
- 2. CAFB needs to submit a topographic map(s) which meets the requirements of 40 CFR Part 270.14(b)(19) for the following units:
  - Landfill No. 2, 3, 4, and 5,
  - Fire Department Training Areas 1, 2, 3, and 4 (Sites 6, 7, 8, and 9),
  - Facility 4028,
  - Engine Test Cell Overflow Pit and Leaching Field (Site 11),
  - Stormwater Collection Point (Site 12),
  - Sludge Weathering Pit (Site 14),
  - Solvent Disposal Site (Site 16),
  - Entomology Rinse Area (Site 17),
  - MOGAS Spill (Site 19), and
  - All of the oil/water separators at CAFB (the file review indicated approximately 21 units).

3. CAFB needs to submit the details of all groundwater monitoring well construction and material specifications. At a minimum, CAFB must submit the following:
  - (a) The driller's logs;
  - (b) type of drilling method;
  - (c) material of construction and joint bonding;
  - (d) inside diameter of well;
  - (e) screen length and screen elevation;
  - (f) details regarding material in the annular space around the well;
  - (g) completion procedures;
  - (h) elevation of each well casing;
  - (i) sampling procedures;
  - (j) analysis procedures;
  - (k) groundwater elevation in each well; and
  - (l) sample analysis results.
4. CAFB shall submit the certification that wells are properly constructed. This certification was to have been prepared by a qualified geologist or geotechnical engineer. Each monitoring well certification shall be accompanied by a certification report, including an accurate log of the soil boring, which thoroughly describes and depicts the location, material setting elevation, screen elevation, material specifications, construction details, and soil conditions encountered in the boring of the well.
5. Sample analysis results shall be accompanied by the procedures used for sample collection, preservation, shipment, analytical procedures used, including a reference from Test Methods for Evaluating Solid Waste (SW-846) and for the chain of custody.
6. CAFB needs to provide the following for the subsurface stratigraphy: Type, composition, texture, grain size distribution and gradation, moisture content, permeability, porosity, discontinuities in the soil strata, location and type of weathered bedrock and solution channels.
7. CAFB must provide the following about that portion of the High Plains Aquifer below CAFB: the permeability of the water-bearing strata, transmissivity, storativity, groundwater flow velocity, effective porosity, and identification of recharge and discharge areas.
8. CAFB must provide information on any releases from all of the oil/water separators, active or inactive, at CAFB.
9. Did CAFB notify EPA in February 1983 that they had created a RCRA surface impoundment for holding ignitable wastes for emergency purposes? Does CAFB intend to use this overflow impoundment in the future for emergency use?

10. CAFB proposed extensive soil sampling in the Phase II Task Description of July 18, 1984. CAFB needs to provide all the locations, on a map, for each soil boring made. CAFB must also provide the vertical location at which the sample was taken. If samples have been analyzed, CAFB needs to submit the analysis results along with all relevant quality assurance/quality control (QA/QC) information. For all groundwater monitoring samples taken, CAFB must submit all information requested in Specific Comments 3(i) - 3(1).
11. CAFB needs to provide detailed construction drawings of the Entomology Rinse Area "pit". Is this a surface impoundment, tank, or a sump?
12. CAFB needs to provide the location, QA/QC information, and depth of the sample showing an oil and grease concentration of 0.012 gm/kg at the Sludge Weathering Pit (Site 14).
13. Phase I of the IRP discusses that no buried waste was encountered during the construction of the golf course. How much of Landfill No. 1 was excavated and where was the excavated material placed?
14. CAFB needs to provide the estimated depth of each landfill.
15. CAFB needs to submit the analysis from the off-site private irrigation well near Landfill No. 5 if one has been obtained, and as much of the information requested in Specific Comment 3 as is available.
16. CAFB needs to submit the manufacturers information on PD-680, Type II.
17. CAFB needs to provide a list of the solvents that are used and have been used.
18. CAFB should provide an analysis of the waste oils for hazardous constituents and a best estimate of how much and where this oil was used for dust suppression.
19. CAFB needs to provide the management procedures, including inspections for structural integrity, which have been used for Facility 4028. Have any releases occurred from this tank?
20. CAFB should perform shallow cores at Site 11 to determine how deep the effluent has seeped and how it is effecting hydraulic conductivity.
21. CAFB needs to submit samples of the effluent from the Engine Test Cell Facility to the overflow pit and the leaching field (Site 11).
22. CAFB should remove and properly dispose of the empty TCE drums at the Solvent Disposal Site (Site 16). Results from sampling the sand above the liner needs to be submitted.
23. CAFB must provide details, including sampling, that was done during cleanup of the Blown Capacitors Site (Site 10).

24. The runoff from the maintenance pad to the AGE Drainage Ditch is defined as a release of hazardous constituents. CAFB needs to submit a remedial investigation plan which will define the extent of the release horizontally and vertically. CAFB must also propose corrective action to cleanup this release and modify management practices to prevent future releases to the ditch.

Additional Comments (Regulatory requirement 40 CFR 266.23)

1. The use of waste or used oil or other material, which is contaminated with dioxin or any other hazardous waste (other than a waste identified solely on the basis of ignitability), for dust suppression or road treatment is prohibited.