



**BRUCE KING**  
GOVERNOR

*State of New Mexico*  
**ENVIRONMENT DEPARTMENT**  
*Harold Runnels Building*  
*1190 St. Francis Drive, P.O. Box 26110*  
*Santa Fe, New Mexico 87502*  
*(505) 827-2850*

**JUDITH M. ESPINOSA**  
SECRETARY

**RON CURRY**  
DEPUTY SECRETARY

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

September 30, 1993

Colonel William M. Guth  
Base Commander, 27 FW/CC  
100 South DL Ingram Blvd. Suite 100  
Cannon AFB, New Mexico 88103-5214

**Re: Closure Certification Cell 3, Landfill 5**  
**NM7572124454**

Dear Col. Guth:

The Hazardous and Radioactive Materials Department (HRMB) of the New Mexico Environment Department (NMED) is in receipt of Cannon Air Force Base's (CAFB) closure certifications for Landfill 5, Cell 3 Soil Cap submitted pursuant to HWMR-7 Part VI, 40 CFR § 265.115. After review of the closure work conducted per the approved closure plan and documented in the report entitled: Landfill #5, Cell#3 Soil Cap, Cannon Air Force Base, New Mexico dated August 1993, NMED finds that the closure was conducted substantially in accordance with the approved closure plan, and is hereby conditionally accepting your closure certification with the following conditions:

1. Certified Test Reports

Specification Part 1.4 of Section 02210, Grading and Section 02224, Gas Vent System require certified test reports and analysis showing materials conform to the specified requirements. In addition, the Construction Quality Assurance (CQA) plan under sections I.B.1.b, I.B.2.c, I.C.1.b, I.C.2.a, I.D.1.b, I.F.1.b, I.F.2.a. require that each and all tests performed be certified by a Registered Professional Engineer. CAFB shall provide HRMB with Certifications by a Registered Professional Engineer from the contract laboratories for all tests performed for this project confirming that all tests were conducted in compliance with the applicable methods and that all test results are true and accurate.

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2. Density Control

Part 3.5.6 of Section 02210 of the specifications requires one in-place density and one in-place moisture test be performed for hand compacted areas. CAFB must supply the certified test results for the areas of the cover which were trenched and hand compacted in order to install the vertical members of the gas vents.

3. Sieve Analysis

Construction Quality Assurance (CQA) sieve analysis for Section 02224, Gas Vent System, did not conform to Part 1.3.1.1 of the specifications. CAFB must supply evidence that the results for these CQA tests show conformance to the specification.

4. Mill Certificates

Specification Part 1.3 of Section 02245, Geocomposite Membrane Liner, requires that mill test reports accompany the manufacturer's certification of compliance. CAFB shall provide HRMB with the mill test reports.

Specification Part 2.3 of Section 02215, Plastic Filter Fabric, requires that a mill certificate or affidavit be supplied to the Contracting Officer attesting that the geotextile meets the specification requirements. CAFB shall provide HRMB with the mill certification and actual test results for the geotextile used in the cap.

5. Preparation of Subgrade for GML

Specification Part 3.1 of Section 02245, Geocomposite Membrane Liner (GML), requires that an authorized representative of the GML manufacturer certify in writing that the surface on which the GML is to be placed is acceptable prior to start of GML placement. CAFB shall provide HRMB with a copy of that certification.

Other instances of non-conformance to the approved closure plan noted were: Construction Quality Control sampling was not conducted at the frequency specified, PVC pipe was not exactly to the specifications, shop drawings for anchorage details were not included, no submittal form showing acceptance of the contractor's as-built drawing was included, and the CQA reports failed to mention the results of pre and post-inspection requirements. NMED has determined that these incidences of non-conformance will not affect our decision to conditionally accept CAFB's closure certification. However, CAFB must supply the information requested in 1-5 within thirty (30) days of your

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within the 30 day time limit may result in denial of CAFB's closure certification.

Post-closure care for this hazardous waste management unit begins after completion of closure and continues for thirty (30) years. On September 2, 1992, HRMB issued a Notice of Deficiency for the Post-closure Care Plan submitted as part of your Post-closure Care Permit Application (dated 2/18/92). Pursuant to HWMR-7, 40 CFR § 265.118, CAFB must submit a technically and regulatorily adequate Post-closure Care Plan within ninety (90) days of your receipt of this letter. This new plan must include your responses to the NMED's Notice of Deficiency. Issuance of the Post-closure Care Permit will be scheduled to coincide with investigation results for Landfill 5 conducted under the EPA HSWA permit.

If you have any questions regarding this matter, please contact Ms. Stephanie Stoddard of my staff at 827-4308.

Sincerely,



Kathleen M. Sisneros, Director  
Water and Waste Management Division

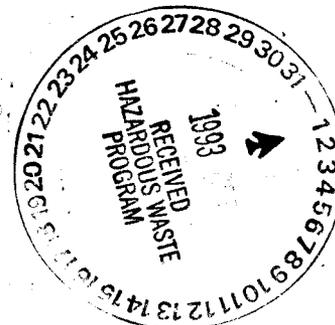
xc: William K. Honker, U.S. EPA Region 6  
Thomas Manning, AFCEE  
File

DEPARTMENT OF THE AIR FORCE  
27TH CIVIL ENGINEERING SQUADRON (ACC)  
CANNON AIR FORCE BASE NM 88103-5136

27 CES/CC  
111 Engineers Way  
Cannon AFB NM 88103-5136

29 SEP 1993

Mr Edward L Horst, Program Manager  
Hazardous Waste Enforcement & Inspection  
New Mexico Environment Department  
1190 St Francis Drive  
PO Box 26110  
Santa Fe NM 87503



RE: JP-4 Spill Cleanup Update

Dear Mr Horst

The cleanup activities on our JP-4 fuel spill of September 10, 1993 were completed on September 24, 1993.

To aid us in our cleanup operations, we hired Environmental Spill Control, Inc to oversee the operation and provide onsite confirmatory sampling. Our cleanup involved excavating approximately 75 cubic yards of contaminated soil. We have constructed two containment areas in order to adequately contain all the contaminated soil. Test results at three spots under the existing asphalt surface indicated the base course had high levels of Total Petroleum Hydrocarbons (TPH). However, test results on the native soils directly beneath the base course were found to be clean, indicating contamination has not occurred beyond the road material. Therefore, a decision was made to leave the road material (asphalt and base course) in place. By removing all of the contaminated soil above the asphalt surface, we believe our plan of action has adequately identified, removed, and contained all contaminated soil resulting from the spill. As soon as the Environmental Spill Control, Inc. report is finalized, a copy will be forwarded to your office.

Until the initial test results are returned and a hazardous waste determination has been made, the soil will remain in the two containment areas and covered. This will assure your office that we are not treating hazardous waste without your authorization. When the results are obtained we will contact your office for further assistance.

If there are any questions, our point of contact is Ms Marlene Weishuhn, (505) 784-4348.

Sincerely,

LAWRENCE NYGREN, GM-14  
Deputy Base Civil Engineer

cc: Ms Barbara Hoditscheck, NMED  
Mr Dave Morgan, NMED