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DEPARTMENT OF THE AIR FORCE
27TH CIVIL ENGINEER SQUADRON (ACC)
CANNON AIR FORCE BASE NEW MEXICO

05 OCT 1999



Lieutenant Colonel Eric J. Wilbur
Commander
506 N DL Ingram Blvd
Cannon AFB NM 88103-5136

Ms. Jackie Greensage
US Environmental Protection Agency
Region VI (6WQ-CA)
1445 Ross Avenue Ste 1200
Dallas TX 75202-2733

Dear Ms. Greensage

This letter is intended to demonstrate that domestic sewage sludge remaining on Cannon Air Force Base (AFB) property for longer than two years will not be stored in an active sewage sludge unit. Requirements cited in 40 Code of Federal Regulations, Part 503, Subpart C—Surface Disposal, §503.20(b), must be demonstrated by addressing items a through e, below.

— SWMU 101

In June 1998, two facultative wastewater treatment lagoons were deactivated following completion of the Cannon AFB wastewater treatment plant (WWTP). Lagoons received all wastewater entering the sanitary sewer system. Treated effluent was discharged to an on-base Playa Lake, while sludge remained in the lagoons. Cannon AFB is authorized to discharge raw wastewater to the inactive lagoons, however, prior approval from the New Mexico Environment Department (NMED) must be obtained. Since completion of the WWTP, the lagoons have only received wastewater on three occasions (twice during emergency repairs and once to install a valve near the chlorine contact basin). No discharges occurred from the lagoons during these events; therefore, these lagoons are considered inactive.

- a. The name and address of the person who prepares the sewage sludge.

Mr. John K. Rebman
27th Civil Engineer Squadron
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b. The name and address of the person who either owns the land or leases the land. The Department of Defense "owns" Cannon AFB. As Commander of the 27th Civil Engineer Squadron, I have overall responsibility for wastewater treatment operations at Cannon AFB.

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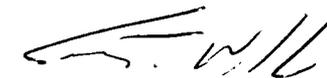
c. The location, by either street address or latitude and longitude, of the land. The location of the facultative lagoons is: Latitude (N) 34°23'18"/Longitude (W) 103°18'18".

d. An explanation of why sewage sludge needs to remain on the land for longer than two years prior to final use or disposal. The facultative lagoons are identified as a solid waste management unit (SWMU) under the Cannon AFB Resource Conservation and Recovery Act (RCRA) Part B permit. Actions necessary to formally close this SWMU are currently being investigated through the RCRA Corrective Action process. Final disposal is contingent upon NMED acceptance of the proposed lagoon closure strategy and availability of funding. Cannon AFB is currently negotiating a contract through the US Army Corps of Engineers to begin the Corrective Measures Study (CMS) portion of the RCRA Corrective Action process. Following regulator acceptance of the CMS closure strategy, a project will be awarded to initiate closure actions. A Corrective Measures Implementation (CMI) project is programmed for fiscal year 2001 execution. Cannon AFB expects final sewage sludge disposal to be completed by October 2002, provided the CMS/CMI process remains on track.

e. The approximate time period when the sludge will be used or disposed. Final sewage sludge disposal is expected by October 2002.

If you require any additional information, which demonstrates sludge will not be stored in an inactive sewage sludge unit, please contact Mr. Rebman at (505) 784-1099.

Sincerely



ERIC J. WILBUR, Lt Col, USAF

cc:

NMED, Hazardous & Radioactive Material Bureau (Dr. R. Dinwiddie)
NMED, Ground Water Quality Bureau (J. Jacobs)