

Subject: Cannon AFB, NM Landfill 5, Cell 3

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HSWA CAFB 5



Matt:

This is to serve as notice to EPA that the New Mexico Environment Department - Hazardous Waste Bureau has decided to defer the regulated unit requirements (§ 264/265, Subparts F, G, and N) for Landfill 5, Cell 3 at Cannon AFB (EPA ID NO.: NM7572124454) from the permitting program to the corrective action program. Cannon's requirement to conduct facility-wide corrective action is specified in Module IV of their Container Storage Operating Permit.

Landfill 5, Cell 3 is a landfill cell surrounded by other cells in Landfill 5 (SWMU 113) that are being investigated and remediated as SWMUs in accordance with Cannon's HSWA Module (Module IV). Cell 3 was closed with waste left in place with a RCRA cap and was on the post-closure track. All other landfill cells at Landfill 5 are being investigated and remediated as SWMUs, in accordance with Cannon's HSWA Module. This situation is identical with the scenario discussed by EPA in their Post-closure Rule (63 FR 56725).

In order to ensure that cleanup standards at Landfill 5 (SWMU 113) are consistent, the Department has determined that handling Cell 3 as a SWMU is the most appropriate course of action at this time. Therefore, please make the appropriate revisions to RCRIS. As of the February 1, 2001 review, "LND5CELL3" was still being carried on the post-closure track.

If you have any questions or if we need to take any additional action, please call me at 505-428-2551.

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