



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Telephone (505) 428-2500
Fax (505) 428-2567
www.nmenv.state.nm.us



PETER MAGGIORE
SECRETARY

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

November 6, 2001

Colonel Jeffrey A. Remington
Commander
100 S. DL Ingram Blvd Suite 108
Cannon AFB, New Mexico 88103-5214

**RE: REQUEST FOR SUPPLEMENTAL INFORMATION
RCRA PERMIT APPLICATION - PART A & PART B
CANNON AIR FORCE BASE
EPA ID NO. NM7572124454
CAFB-99-005**

Dear Colonel Remington:

On October 31, 2000 the New Mexico Environment Department (NMED) completed its first technical review of the Cannon Air Force Base (Cannon) RCRA Permit Renewal Application (Parts A and B) submitted on July 13, 1999 and determined that the application was not technically adequate and that changes were necessary before it could be approved. Cannon submitted the required changes on February 20, 2001. NMED has reviewed Cannon's revised Permit Renewal Application for technical merit and found that several revisions, mostly minor, are necessary before we can reissue the draft permit for public comment. Therefore, NMED is issuing Cannon with this **REQUEST FOR SUPPLEMENTAL INFORMATION (RSI)**.

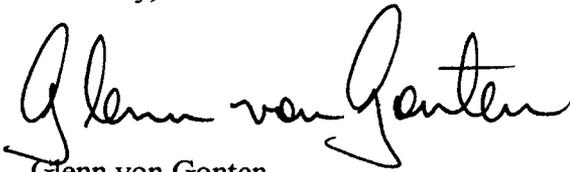
NMED's numbered comments are included as ATTACHMENT 1 and constitute our second technical review of Cannon's permit renewal application. Please submit a revised Permit Application or replacement pages within thirty (30) days of your receipt of this RSI. In addition, please include a response letter that indicates exactly where revisions have been made, cross-referencing NMED's numbered comments.

RED CAFB101

Colonel Remington
Request for Supplemental Information
Page 2

If found to be technically adequate, NMED will complete drafting Cannon's RCRA Permit. In accordance with 20.4.2.201.3.3 NMAC, NMED shall review the application and issue a Draft Permit or a Notice of Intent to Deny the Permit within one year after the application is deemed administratively complete, excluding time tolled during all periods in which NMED is awaiting a response from the applicant to a Request for Supplemental Information or a Notice of Deficiency. If you have any questions concerning this NOD, please call me at 505-428-2551.

Sincerely,



Glenn von Gonten
CAFB Project Leader
RCRA Permits Management Program

GvG:gvg
[CAFB-99-005]

cc: James P. Bearzi, NMED HWB
David Cobrain, NMED HWB
John Kieling, NMED HWB
Pam Allen, NMED HWB
Daniel A. Barnett, 27 CE/CEV
Denny Timmons, CAFB 27 CE/CEVP
Don White, CAFB 27 CE/CEVP
Vera Wood, CAFB 27 CE/CEVP
David Neleigh, EPA Region 6
Reading File and CAFB Red File [CAFB-99-005]

ATTACHMENT 1

ATTACHMENT 1

The following numbered comments comprise NMED's second technical review of Cannon's Permit Renewal Application. As noted above, please provide a written response to each numbered comment as well as the actual revisions to the application.

PERMIT APPLICATION - PART B

Comment 1: Please correct the following underlined and bolded typographical errors.

1.1 Cannon Air Force Base

... in accordance with threshold of Runway 22 Cannon AFB latidue is

SECTION 3 - WASTE ANALYSIS PLAN

Section 3 provides the Waste Analysis Plan (WAP) also known as the for Cannon AFB

3.2.3 Waste Oil

OIL that is burned for energy recovery

3.3.1 New and Non-Routine Waste Streams

...generator will contact CE Environmetnal Flight

7.1 INTRODUCTION

The HWSF is designated as Building 226 and is located within a fenced compund with adminiatrative office, Builidng 315, and

7.7.2 External Communications

If this phone is inaccessible, phones in the administrative buildng or other

7.10.2 Record Keeping

...in accordance with informaiton required by 40 CFR 264.56 (j).

13.7.2.1.b Environmental Sampling and Analysis

...and organics by Gas Chromotography-Mass Spectroscopy according

15.1.1 Information Provided by the Generator

...hazardous waste storage faciltiy personnel will verify whether

16.1.6 List of Investigations Completed to Date and Results

23. RCRA Faciltiy Investigation Activities ...

25. *Extent of Contamination South End Flight Line Cannon Air Force Base Clovis, New Mexico Site Assessment Report.* Radian Corportation, Feb 1992. Sites: AOC-B.

16.2 Description Of Solid Waste Management Units And Areas Of Concern

SWMU No. 7 Oil/Water Separator No. 129, Appendix II Site

It receivesd washdown water from Bldg. 129....

SWMU No. 38 Oil/Water Separator No. 194, Appendix II Site

The unit was actuve since 1971

SWMU No. 38 Oil/Water Separator No. 194, Appendix II Site

The unit was actuve since 1971

SWMU No. 57 Oil/Water Separator No. 379, Appendix III Site

The influent contains oil and grease..This unit

Request for Supplemental Information
Attachment 1
Page 3

SWMU No. 70 Oil/Water Separator No. 326 and Leach Field, Appendix III Site

A bioventing sytem was installed

SWMUs 86, 87, 88, 89, and 90.

A Remdial Investigation in 1990 ...

SWMU No. 104 Landfill No. 4, Appendix I Site

A Baselline Risk Assessment concluded

SWMU No. 105 Landfill No. 3, Appendix I Site

... in 1994 in a Phase II RFI and the welll continues to be ...

SWMU No. 106 Fire Department Training Area No. 2, Appendix I Site

A Remedial Investigaion of 18 IRP/SWMU sites was

SWMU No. 108 Explosive Ordnance Disposal (EOD) Activities Area, Appendix II Site.

The site contiues in use and no further investigations

Comment 2: In several places CAFB's application refers to "HRMB" rather than "HWB"; please correct these typos.

SECTION 3 - Waste Analysis Plan

Comment 3: Cannon's application refers to a "Waste Analysis Plan" in Section 3 of the application and another stand-alone document referred to as the "Civil Engineers Environmental and Bioenvironmental Engineering Waste Analysis Plan for Cannon Air Force Base" in Section 3 and entitled "Hazardous Waste Analysis Plan". It appears that Cannon has provided this stand-alone document (Hazardous Waste Analysis Plan) in response to "Comment 6" in our first technical review of October 31, 2000. Thank you for providing us with document; however, the text of the application should be revised to make it more clear which "WAP" is being referred to. NMED suggests that Cannon reformat the application to refer to the "Hazardous Waste Analysis Plan" as an attachment and provide a discussion of the WAP or HWAP in Section 3 rather than have any potential conflict between the text of Section 3 and the attached WAP/HWAP.

HAZARDOUS WASTE ANALYSIS PLAN (SEPTEMBER 2000)

NMED has reviewed CAFB's stand-alone Hazardous Waste Analysis Plan (September 2000) and has the following comments.

Table of Contents

Comment 4: The Table of Contents has several formatting errors that should be corrected.

3.2 Waste Analysis Parameter Selection

Comment 5: CAFB should revise this section to indicate that waste analyses will be compared with the approved EPA Waste Codes that will be specified in the permit. If the waste analyses detect additional hazardous wastes that are not specified in CAFB's permit, then a permit modification will be required.

Table 3-1 Analysis Parameters

Comment 6: Please correct the typo in this heading.

3.3 Waste Parameter Rationale

Comment 7: Please revise the text to read as follows: "The waste parameters selected in Table 3-1 are based on the **known or suspected** hazardous waste characteristics."

3.3.2 Toxicity Characteristic Leachate Procedure (TCLP)

Comment 8: Please specify the use of SW-846 Method 1311 in this section.

.3.3 Corrosivity

Comment 9: NACE method TM-01-69 does not include certain common organic corrosives such as acetic acid and amines. Please revise this section to indicate that CAFB will analyze aqueous liquids for pH to determine whether they meet the corrosivity characteristic using Acceptable Knowledge, pH paper or a SW-846 method.

TABLE 4-2 SAMPLE CONTAINERIZATION, PRESERVATION AND HOLDING TIMES

Comment 10: Please revise Table 4-2 to specify the use of SW-846 Method 8270 rather than Method 625 for semivolatile organics (liquid and solid).

4.4.3 Shipping Papers

Comment 11: Please specify that copies of the shipping papers will also be sent to NMED in order to ensure the status of the generator.

6 QUALITY ASSURANCE/QUALITY CONTROL

Comment 12: Please specify that CAFB will ensure and document their Acceptable Knowledge through sample analysis.

6.2 Sample Collection QA/QC

Comment 13: This section indicates that CAFB will only collect trip and equipment blanks if cross-contamination is suspected. Please revise this section to indicate that CAFB will routinely collect and analyze trip and equipment blanks following SW-846 guidance (see SW-846 Chapter One, Section 3.4.1).

6.2.2 Equipment Blank

Comment 14: Please revise this section as follows:

"At a minimum, equipment blanks will be collected and analyzed for each day that samples are collected. ~~on a semiannual basis and will be linked to the sample technician's performance evaluation. The CEV/BEE will determine if equipment blanks are required more frequently based on visual inspections of decontaminated equipment and previous laboratory results.~~—One matrix spike/matrix spike duplicate and one duplicate sample shall be collected and analyzed for every 20 samples for a given waste stream type or for one sampling event, in accordance with SW-846 Chapter One, Section 3.4.1."

8.3 Sample Collection Training

Comment 15: Please revise this section to read as follows: "RCRA training, in accordance with 40 CFR 264.16 and 265.16, for all CEV/BEE sampling personnel ~~will~~ should be arranged prior to assignment."