

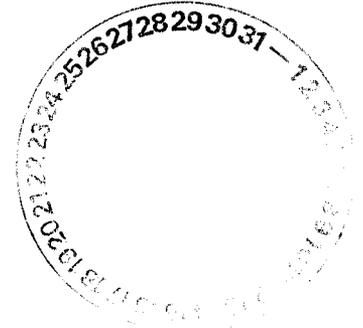


CAB 2003
DEPARTMENT OF THE AIR FORCE
27TH CIVIL ENGINEER SQUADRON (ACC)
CANNON AIR FORCE BASE NEW MEXICO

24 SEP 2003

Mr. Robert S. Pyeatt
Deputy Base Civil Engineer
506 N DL Ingram Blvd
Cannon AFB NM 88103-5003

Mr. John E. Kieling, Program Manager
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East-Building 1
Santa Fe, New Mexico 87505-6063



Dear Mr. Kieling,

Cannon AFB has the following comment to the subject draft permit:

Page 3, Section 1.4, *Area of Concern (AOC)* – we believe it should read “...hazardous waste or constituents that is not from a **known** solid waste management unit...” If a release is confirmed, then the AOC would become a SWMU.

Pages 5-11, Part 1.5, *DUTIES AND REQUIREMENTS* - In Part 1.5 the term **noncompliance** seems to be inconsistent in its use in certain sections. It may be beneficial to define **noncompliance** as it pertains to the applicable sections (1.5.1, 1.5.5, 1.5.10.b, 1.5.10.c.i, 1.5.10.c.ii, 1.5.10.e, and 1.5.11), or replace the word **noncompliance** in sections 1.5.10.c.i and 1.5.10.c.ii with **release**.

Page 7, Section 1.5.9.a, *Representative Sampling* - Please add language that would better define requirements for initial sampling and continued sampling dependent upon results found over a period of time (i.e. three years, etc). We would like to be able to limit future sampling efforts or come to a determination of no further action based on sampling results.

Page 10, Section 1.5.10.d, *Unmanifested Waste Report* – We believe this language is non-applicable to Cannon AFB and should be removed. Cannon AFB does not receive unmanifested waste.

Page 10, Section 1.5.10.e, *Other Noncompliance* - There is a reference to "...Permit Condition 1.5.10.d.ii,..."; paragraph "1.5.10.d.ii" does not exist.

Page 13, Section 2.1.1, *Solid Waste Management Units and Areas of Concern That Require a RCRA Facility Investigation* - We would like to change the last sentence to read: **The Permittee shall submit RFI Work Plans within 180 days of the New Mexico Environmental Department's request to do so.** We are requesting this change because (1) we are still in the process of trying to find documentation of an RFI being completed for those SWMU's and AOC's listed in that section of the draft permit, and (2) because of our funding structure requirements we would like to work with NMED to agree on a date when we know we will have the requested funding in hand for an RFI Work Plan.

Page 18, Before Section 2.5 – We would like NMED to insert language for the concept of a Release Assessment (RA). The RCRA Corrective Action Plan also calls the RA a “Phase 1 RFI”. The idea is to minimize activities on sites that may not warrant a complete RFI.

If you have any questions or comments, please contact my POC, Mr. Peter P. Zamie at 505-784-1092.

Sincerely,



ROBERT S. PYE, ATT, GS-13

cc:
NMED (G. von Gonten)