

CAFB 2004

*State of New Mexico*  
**ENVIRONMENT DEPARTMENT**

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

January 12, 2004

Colonel Robert Yates  
Commander, 27<sup>th</sup> Fighter Wing  
100 D.L. Ingram Blvd., Suite 100  
Cannon Air Force Base, New Mexico 88103-5214

**SUBJECT: NO FURTHER ACTION PETITION**  
**CANNON AIR FORCE BASE, NEW MEXICO**  
**EPA ID No.: NMD000804294**

Dear Colonel Yates:

The New Mexico Environment Department (NMED) has reviewed Cannon AFB's Class 3 Modification Request - No Further Action Proposals (NFA) submitted on September 5, 2000, as required pursuant to 20.4.2 NMAC. Any document submitted by a facility for review and approval must first pass an initial review to determine if all the required parts are contained in the document and that NMED are available to conduct the review in a timely fashion. Because of the number of solid waste management units (SWMUs) and areas of concern (AOCs) involved and limited resources, NMED has been unable to complete its initial review until recently.

As discussed with your staff, NMED recommends that Cannon resubmit its Petition for NFA Review. Many of the SWMUs and AOCs do not qualify for NFA approval either because these sites have never been adequately investigated, are sites that Cannon has submitted corrective measures studies that have not been reviewed, or are sites at which corrective measures have not yet been completed (see Table 1, Attachment 1). Cannon must conduct additional investigation and/or complete its final remedies before these sites can qualify for a NFA determination.

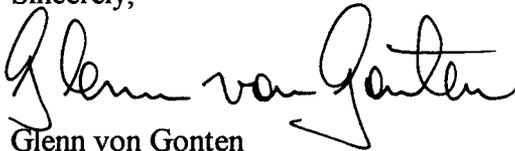
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However, NMED has determined that approximately 35 SWMUs and AOCs appear to qualify for NFA approval (see Table 2, Attachment 1). Cannon has investigated or remediated these sites to NMED's satisfaction and NMED has previously recommended that Cannon submit a NFA petition (see Table 3, Attachment 1). NMED recommends that Cannon submit a new NFA petition for these 35 specific sites only in order to expedite the NFA review and approval process.

There are also several SWMUs and AOCs that Cannon may be able to justify including in its NFA petition with some additional information (see Table 3, Attachment 1), such as the inclusion of an approval letter from another bureau (*e.g.*, USTB).

If you have any questions concerning this letter, please call me at 505-428-2551.

Sincerely,



Glenn von Gonten  
CAFB Project Leader  
Permits Management Program

GVG:gvg

Attachment

cc: S. Y. Martin, NMED HWB  
J. Kieling, NMED HWB  
D. Cobrain, NMED HWB  
L. King, EPA Region 6 (6PD-N)

File: Reading, ~~CAFB~~ 00-003, CAFB 2004

**ATTACHMENT 1**

**TABLE 1  
SWMUS AND AOCs THAT DO NOT QUALIFY FOR NFA DETERMINATION**

<b>SWMU/AOC</b>	<b>DESCRIPTION</b>	<b>COMMENTS</b>
AOC A	MOGAS Spill Site	No. Product spills that are not remediated are SWMUs/AOCs. Nb., Was designated as a SWMU/AOC in permit.
AOC B	JP-4 Fuel Spill	No. Product spills that are not remediated are SWMUs/AOCs. NB., Was designated as a SWMU/AOC in permit.
AOC C	Blown Capacitor Site	No. Product spills that are not remediated are SWMUs/AOCs. NB., Was designated as a SWMU/AOC in permit.
SWMU 2	Recovered Tank No. 108	No. Never Investigated. Need additional RFI phase.
SWMU 4	Recovered Tank No. 121	No. Never Investigated. Need additional RFI phase.
SWMU 31	AGE Maintenance Shop Pad	No. CMS is under review
SWMU 48a	Underground Waste Oil Tank	No. CMS is under review
SWMU 49	Inactive POL Storage Tank No. 4028a	No. Never Investigated. Need additional RFI phase.
SWMU 50	Inactive POL Storage Tank No. 4028b	No. Never Investigated. Need additional RFI phase.
SWMU 75	Sanitary Sewage Lift Station Overflow Pit	No. Never investigated. Cannot NFA accidental spill site that was neither investigated nor cleaned up.
SWMU 77	Civil Engineering Container Storage Area	No. CMS is under review
SWMU 86	Engine Test Cell	No. CMS is under review
SWMU 87	Former Overflow Pit	No. CMS is under review
SWMU 88	Former Leaching Field	No. CMS is under review
SWMU 89	Evaporation Pond	No. CMS is under review
SWMU 90	OWS No. 5114	No. CMS is under review
SWMU 91	Recovered Fuel Tank No. 5114	No. Bulk product AST requires investigation.

**TABLE 1  
SWMUS AND AOCs THAT DO NOT QUALIFY FOR NFA DETERMINATION**

<b>SWMU/AOC</b>	<b>DESCRIPTION</b>	<b>COMMENTS</b>
SWMU 97	Concrete Rubble Pile (Landfill 25)	No. CMS is under review.
SWMU 101	Wastewater Treatment System - Lagoons (2)	No. CMS is under review
SWMU 103	Wastewater Playa Lake	No. Eco Risk pending
SWMU 104	Landfill No. 4	No. CMS is under review
SWMU 105	Landfill No. 3	No. CMS is under review
SWMU 109	FTA 4	No. CMS is under review. Not included in NFA petition
SWMU 110	Underground Waste Oil Tank No. 2336 at FTA 4	No. CMS is under review. Not included in NFA Petition
SWMU 111	Unlined Pit at FTA 4	No. CMS is under review
SWMU 112	OWS No. 2336 at FTA 4	No. CMS is under review
SWMU 125	Inactive UST 2	No. Never investigated. UST was abandoned in place. EPA's decision that fuel/product at AST/USTs does not require investigations is not shared by NMED. Must conduct investigation.
SWMU 127	OWS Near Tank 4095 (#1) & Leach field	No. CMS is under review
SWMU 129	Waste Oil Storage Facility 244. Formerly known as AOC "I"	No. CMS is under review. Was not included in NFA Petition

**TABLE 2  
SWMUS AND AOCs THAT APPEAR TO QUALIFY FOR NFA DETERMINATION**

<b>SWMU/AOC</b>	<b>DESCRIPTION</b>	<b>COMMENTS</b>
SWMU 1	OWS 119	YES
SWMU 3	OWS 108	YES
SWMU 5	OWS 121	YES
SWMU 7	OWS 129	YES
SWMU 8	OWS 165	YES
SWMU 9	Aircraft Washrack Drain system	YES
SWMU 11	OWS 170	YES
SWMU 16	OWS 680	YES
SWMU 32a	OWS 186 (#1)	YES
SWMU 33b	OWS 186 (#2)	YES
SWMU 38	OWS 194	YES
SWMU 39	OWS 195	YES
SWMU 46	OWS 196	YES
SWMU 47	OWS 494	YES
SWMU 48b	Above Ground Overflow Capacity Tank	YES
SWMU 51	OWS 375	YES
SWMU 55	Lead Acid Battery Accumulation Point	YES
SWMU 57	OWS 379	YES
SWMU 61	OWS 5077a	YES
SWMU 62	OWS 5077b	YES
SWMU 63	OWS 5077c	YES
SWMU 70	OWS and Leach Field 326	YES
SWMU 74	Landfill No. 1	YES
SWMU 83	Sump	YES
SWMU 92	OWS No. 5120	YES

**TABLE 2  
SWMUS AND AOCs THAT APPEAR TO QUALIFY FOR NFA DETERMINATION**

<b>SWMU/AOC</b>	<b>DESCRIPTION</b>	<b>COMMENTS</b>
SWMU 93	OWS No. 5121	YES
SWMU 94	OWS No. 5144	YES
SWMU 108	Explosive Ordinance Disposal Activities Area	YES, but was not included in NFA Petition.
SWMU 113	Landfill 5 Cell 3	YES
AOC D	Asbestos Burial Pit	YES. Listed on Table 2 of CAFB's HSWA Permit
AOC E	Runway Rubble Pile	YES. Listed on Table 2 of CAFB's HSWA Permit
AOC F	Gunsight Target Berm	YES. Listed on Table 2 of CAFB's HSWA Permit
AOC G	NEW SWMU Report 05/15/97	YES
AOC H	NEW SWMU Report 05/15/97	YES
DP-33		Yes. GWQB Approved NFA proposal on 12/12/1996

**TABLE 3  
SWMUS AND AOCs THAT MAY QUALIFY FOR NFA DETERMINATION**

<b>SWMU/AOC</b>	<b>DESCRIPTION</b>	<b>COMMENTS</b>
SWMU 6	POL Tank No. 129	Maybe. Additional documentation required. Need UST Close Out Report.
SWMU 10	POL Tank No. 170	Maybe. Never investigated Removed IAW UST Regulations. Additional documentation required. Need UST Close out report.
SWMU 34	AGE Drainage Ditch	Maybe. Additional documentation required.
SWMU 36	MWR Auto Body Shop	Maybe. Additional documentation required.
SWMU 71	Recovered JP-4 Fuel Tank No. 390	Maybe. Duplicate of SWMU 72. Need to document the NFA petition conclusions in a Report.
SWMU 72	OWS 390	Maybe. Additional documentation is needed to show that SWMU 71 is a duplicate of SWMU 72 in a RFI Report.
SWMU 76	Sludge Weathering Pit	Maybe. Additional documentation required.
SWMU 78	FTA 1	Maybe. Additional documentation required.
SWMU 79	UST at FTA 1	Maybe. Never Investigated - never existed? NFA Petition states that this SWMU did not exist. Additional documentation required.
SWMU 81	Solvent Disposal Site	Maybe. Additional documentation required.
SWMU 82	Landfill No. 2	Maybe. Additional documentation required.
SWMU 85	Stormwater Collection Point	Maybe. CAFB presumed that EPA's lack of response indicated acceptance. Additional documentation required.
SWMU 95	NE Stormwater Drainage Area	Maybe. Additional documentation required.

**TABLE 3  
SWMUS AND AOCs THAT MAY QUALIFY FOR NFA DETERMINATION**

<b>SWMU/AOC</b>	<b>DESCRIPTION</b>	<b>COMMENTS</b>
SWMU 96	Old Entomology Rinse Area	Maybe. Additional documentation required.
SWMU 98	Sanitary Sewage Line	Maybe. Additional documentation required.
SWMU 102	Wastewater Treatment Effluent Discharge	Maybe. Additional documentation required.
SWMU 106	FTA 2	Maybe, but CAFB must supply copy of approved 1994 RFI Work Plan and subsequent RFI Report
SWMU 107	FTA 3	Maybe, but CAFB must supply copy of approved 1994 RFI Work Plan and subsequent RFI Report
SWMU 124	Inactive UST 1 Duplicate of SWMU 48A	Maybe. Assertion that SWMU 124 is a duplicate of SWMU 48A has not been previously documented.
SWMU 126	Inactive UST 3 Closed in accordance with NMED UST regulations	Maybe for Criterion 4. Must provide UST close out report. EPA's opinion that an investigation at fuel/product ASTs/USTs is not required is not shared by NMED.
SWMU 128	OWS Near Tank 4095 (#2) & Leach Field	Maybe. Additional documentation required.