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State of New Mexico  
**ENVIRONMENT DEPARTMENT**

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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

May 4, 2007

Colonel Scott D. West  
Commander 27<sup>th</sup> Fighter Wing  
100 D.L. Ingram Boulevard, Ste 100  
Cannon Air Force Base, New Mexico 88103

**RE: NOTICE OF DISAPPROVAL  
FINAL CONSTRUCTION COMPLETION REPORT FOR THE REMEDIAL  
ACTION AT SWMU 97 – LANDFILL NO. 25  
CANNON AIR FORCE BASE, NEW MEXICO  
EPA ID NO. NM7572124454**

Dear Colonel West:

The New Mexico Environment Department (NMED) has received and reviewed the Cannon Air Force Base's (CAFB) *Final Construction Completion Report for the Remedial Action at SMMU 97 – Landfill No. 25* (Report) dated November 2001 and *Remedial Action Work Plan for SWMU 97 – Landfill No. 25* (Work Plan) dated July 2000 (Volumes 1 & 2). NMED has determined that the Report is technically deficient. While NMED does not require resubmission of the entire Report, the Permittee must respond to the comments provided in this letter and supply the requested additional information within 60 days of the receipt of this letter. NMED will reevaluate the report once the requested information is provided.

**Comment 1**

**Section 2.0**

Section 2.0 of the Report presents a description and history of SWMU 97; however, this section gives a broader overview of past investigations. The Permittee must add an additional appendix to the Report to include details about the historical sampling events. The appendix must, at a

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minimum, contain maps (or pictures) showing the sampling locations and the laboratory analytical reports for the sampling results. The Permittee must also include references to the additional appendix in section 2.0 of the report.

Although most of this information is present in the *Petition for No Further Action for Landfill No.3 (LF-03/SWMU 105), Landfill No.4 (LF-04/SWMU 104) and Land fill No.25 (LF-25/SWMU 97* dated May 2006 provided by CAFB as supplemental information, NMED requires CAFB to submit the actual Laboratory reports for the historic sampling events conducted at this site. The table of results generated by CAFB is not sufficient.

**Comment 2**

**Section 3.0**

Section 3.0 of the Report states that "*Native Soil Cover/Debris Consolidation – The remaining exposed debris was consolidated to the extent possible, and 4 to 6 inches of on-site native soil was used as cover*".

The passage does not describe the type of debris and what was done to the debris that would constitute consolidation. The Permittee must clearly explain the type of debris and the meaning of the term "*consolidated*" in the sentence.

Please contact Swarna Latha Vonteddu at (505) 476-6057 should you have any questions.

Sincerely,



James P. Bearzi  
Chief  
Hazardous Waste Bureau

JPB: sv

cc: J. Kieling, NMED HWB  
Dave Cobrain, NMED HWB  
C. Frischkorn, NMED HWB  
L. King, EPA Region 6 (6PD-N)  
K. Doll, CAFB  
File: ~~CAFB 2007~~ and Reading  
CAFB-06-003