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RON CURRY  
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Deputy Secretary

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

November 24, 2010

Colonel Stephen A. Kimball, Commander  
27th Special Operations Mission Support Group  
110 E. Sextant Avenue, Suite 1091  
Cannon Air Force Base, New Mexico 88103

**RE: NOTICE OF DISAPPROVAL  
FACILITY-WIDE LONG TERM GROUNDWATER MONITORING PLAN  
CANNON AIR FORCE BASE, NEW MEXICO, SEPTEMBER 2010  
EPA ID #NM7572124454  
HWB-CAFB-10-003**

Dear Col. Kimball:

The New Mexico Environment Department (NMED) has reviewed Cannon Air Force Base's (Permittee's) *Facility-Wide Long Term Groundwater Monitoring Plan for Cannon Air Force Base, New Mexico* dated September 2010 (Plan). NMED hereby disapproves the Plan and provides the following comments.

**Comment 1. Executive Summary, Page ES-1:**

In its description of the conceptual site model the Permittee stated that wastes were generated as a result of primary mission support, industrial operations and, routine Air Force operations that involved the use of pesticides, herbicides and metals. The Permittee must also include fuels, solvents, fire suppressants and explosives that are used in training as types of wastes generated at Cannon Air Force Base (CAFB or the Base).

**Comment 2. Conceptual Site Model, Pages 1-1 through 1-12:**

The Permittee failed to identify optimal locations where additional monitoring wells are necessary based on existing and planned facility operations. The Permittee must generally describe existing and planned operations and their locations within the Base boundaries and identify optimal locations where additional monitoring wells are required to detect potential releases. Figures depicting the locations must also be included in the Plan.

**Comment 3. History of Environmental Programs, Section 1.1.4, page 1-5:**

The Permittee erroneously indicated that the Hazardous Waste Facility Permit was revised in 2005. The Permittee must indicate the correct revision date as 2003.

**Comment 4. Exposure Scenarios, Section 1.1.7, page 1-8:**

The Permittee indicated that the semi-arid climate, caliche layers in the subsurface, and depth to groundwater of approximately 300 feet are factors that serve to prevent contaminant transport to groundwater. While the identified factors may decrease infiltration or migration rates, they do not completely prevent contaminant transport to groundwater. The Permittee must replace the word "prevent" with the word "inhibit" or "reduce".

**Comment 5. Landfill 25 (SWMU 97), Section 1.3.1, page 1-9  
Landfill 4 (SWMU 104), Section 1.3.3, page 1-10  
Landfill 3 (SWMU 105), Section 1.3.4, page 1-11:**

The Permittee indicated that a petition for no further action under NMED criterion 5 and a Class III permit modification were requested for SWMUs 97, 104 and 105 in the *Petition for No Further Action for Landfill 3 (LF-03/SWMU 105), Landfill 4 (LF-04/SWMU 104), and Landfill 25 (LF/SWMU 97, Cannon Air Force Base, New Mexico [HGL, 2006]* and that NMED approved the report in a letter dated December 5, 2007. The term NFA (No Further Action) and the six NMED criteria are no longer used. In accordance with *Final Guidance on Completion of Corrective Action Activities at RCRA Facilities* [Federal Register: February 25, 2003 (Volume 68, Number 37)], NMED reviewed and approved the document as a RCRA Facility Investigation Report (RFI) (See NMED letter dated December 5, 2007). The Permittee proposed that the SWMUs be granted the status of Corrective Action Complete with Controls in the document titled *Corrective Action Complete Proposals, Cannon Air Force Base, Clovis, New Mexico* dated July 2008. NMED approved the proposal November 25, 2009. A petition for a Class III permit modification has not yet been submitted. The Permittee must revise the Plan to accurately describe the documents and regulatory actions.

**Comment 6. Data Quality Objectives, Section 2.1, page 2-1:**

The Permittee stated, "If new groundwater monitoring wells are required, installation will proceed according to 19.27.4 NMAC, 8-31-2005." The Permittee must also submit work plans for new wells for NMED review and approval. The Permittee must revise the language in the Plan accordingly.

**Comment 7. Data Quality Objectives, Section 2.1, page 2-1:**

The Permittee stated, "Decommissioning [of a monitoring well] will be in accordance with the CAFB Groundwater Monitoring Plan (CAFB, 1995)." NMED has not received, reviewed or approved the cited document. Decommissioning of a monitoring well must be conducted in accordance with 19.27.4 NMAC. The Permittee must revise the language in the Plan accordingly.

**Comment 8. Monitoring Requirements, Section 2.2, page 2-1:**

The Permittee described monitoring of groundwater wells at four landfills, the former Sewage Lagoons, and perimeter wells. However, inspection and maintenance of the topography and drainage patterns and the condition of the vegetative covers at the landfills were omitted. In order to replace the existing Long-Term Monitoring Plan, inspection and maintenance of the landfill covers must be conducted as described in the *Long-Term Monitoring and Maintenance Work Plan for Landfill No. 3 (LF-03/SWMU 105), Landfill No. 4 (LF-04/SWMU 104), Landfill No. 25 (LF-25/SWMU 97), and Sewage Lagoons (SWMU 101), Cannon Air Force Base, New Mexico*, dated July 2009 (including the forms in Appendix A) and approved by NMED August 4, 2009. The Permittee must revise the Plan to include the approved inspection and maintenance activities for the landfill covers.

**Comment 9. Water Level Measurements, page 2-2:**

The Permittee did not indicate the frequency of water level measurements. The Permittee must inspect the condition of the monitoring wells and measure water levels annually. The Permittee must revise the Plan accordingly.

**Comment 10. Sampling Parameters, Section 2.2.4, page 2-3  
Comparison to Regulations, Section 3.3.1, page 3-2:**

The Permittee stated that groundwater analytical results will be compared to current EPA Maximum Concentration Levels (MCLs) and New Mexico Groundwater Quality Control Commission Standards (NMGWQSs). In the event that no evaluation criteria are listed for an analyte in the EPA MCLs or NMGWQS, the Permittee must use the criteria for tapwater published in NMED's *Technical Background Document for Development of Soil Screening*

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*Levels, Revision 5.0, August 2009* (NMED SSLs) as updated. The Permittee must include NMED SSLs in the evaluation criteria.

**Comment 11. Reporting Requirements, Section 3, page 3-1:**

The Permittee stated that each report will include a summary table of the groundwater analytical results, test methods used, dates of sample collection and regulatory cleanup requirements. The Permittee must replace the words "cleanup requirements" with "evaluation criteria." The Permittee must also include practical quantitation limits (PQLs) in the table with analytical results and evaluation criteria. The Permittee must also ensure that PQLs are less than the appropriate evaluation criteria.

**Comment 12. Historical Database Creation and Maintenance, Section 3.2, page 3-2:**

The Permittee stated it will use the Air Force Center for Engineering and the Environment Environmental Resources Program Information System to house future and historical data. The Permittee must describe how NMED will access the data or how the historical data will be submitted to NMED (e.g., Excel<sup>®</sup> file).

The Permittee must submit a revised Plan to NMED that addresses all of the comments included in this letter no later than December 31, 2010. The submittal must include an electronic copy with all changes presented in redline-strikeout, in addition to the paper copies.

Please contact Pat Stewart at (505) 476-6059, should you have any questions.

Sincerely,



James Bearzi  
Chief  
Hazardous Waste Bureau

cc: J. Kieling, NMED HWB  
D. Cobrain, NMED HWB  
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