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ENTERED



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RAJ SOLOMON, P.E.
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 18, 2011

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: APPROVAL WITH MODIFICATIONS
2010 BIENNIAL GROUNDWATER MONITORING AND ANNUAL
LANDFILL INSPECTION REPORT; 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, JUNE 2010
EPA ID #NM7572124454
HWB-CAFB-10-004**

Dear Col. Kimball:

The New Mexico Environment Department (NMED) has reviewed Cannon Air Force Base's (Permittee's), *2010 Biennial Groundwater Monitoring and Annual Landfill Inspection Report; 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 December 2010 (Report). NMED hereby approves the report with the following comments and modifications.

Comment 1. Section 3.1, LF-03 (SWMU 105) and Section 3.2 LF-04 (SWMU 104), pages 3-1 through 3-5:

The Permittee indicates that areas of subsidence associated with linear waste burial trenches at the former landfills are visible, but that no subsidence has occurred in the landfill cover since the

last inspection in 2009. The Permittee further indicates that no maintenance or repair of the cover system was required.

The Permittee is referred to Section 3.2.1 (page 3-2) of 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* (Work Plan) dated July 2009. The Work Plan includes descriptions of routine maintenance and repair activities, and requires that areas of subsidence associated with burial trenches at the former SWMU 105 and SWMU 104 were to be filled in and graded to prevent pooling and potential percolation of storm water. Upon submission of the revised Work Plan, which included filling in and grading areas of subsidence, the Permittee stated that the required repairs would be completed prior to the next inspection. The Permittee must comply with the approved work plan and fill in and grade the areas of subsidence associated with burial trenches at the former landfills (SWMU 105 and SWMU 104) as soon as the weather is conducive for the work. Submit documentation that this work has been accomplished no later than June 3, 2011.

Comment 2. Cover System Inspection Report for Landfill 25 (SWMU 97), Appendix A:

NMED noted a discrepancy regarding the presence of a berm on the eastern and southern boundaries of the former landfill. Remarks describing the berms on page 2 of the inspection report indicate the presence of a berm only along the east side of the former landfill. The Permittee is referred to Section 2.3 (page 2-6) of the Work Plan, second paragraph, in which a 2-foot-high permanent earthen berm adjacent to the southern and eastern borders of the former landfill is described. Verify presence or absence in the next annual inspection report. No other response to this comment is required.

Comment 3. Section 5.3.2, Compliance with Water Quality Standards, page 5-3:

NMED notes that toluene, 1,2,4-trimethylbenzene, and naphthalene were detected, albeit at estimated concentrations below reporting limits and significantly less than the applicable U.S. Environmental Protection Agency Maximum Concentration Levels (MCLs) and/or New Mexico Water Quality Control Commission standards (WQCC). If these constituents continue to be detected in future monitoring events, investigation into their source may be required. No response to this comment is required.

Colonel Stephen A. Kimball
February 18, 2011
Page 3

Comment 4. Section 5.3.2, Compliance with Water Quality Standards, page 5-3:

The Permittee indicated that no groundwater standards have been established for 1,2,4-trimethylbenzene and naphthalene. The Permittee must compare concentrations of contaminants to concentrations listed for Tap Water in the NMED Technical Background Document for Development of Soil Screening Levels (as amended) in the case where no standards are available in MCLs or WQCC. No other response to this comment is required.

The Permittee must verify the presence or absence of a 2-foot-high permanent earthen berm adjacent to the southern and eastern borders of the former landfill 25 in the next annual inspection report. The Permittee must submit documentation that subsidence associated with burial trenches at the former landfills (SWMU 105 and SWMU 104) has been filled in and graded no later than June 3, 2011.

Please contact Dave Cobrain at (505) 476-6055, should you have any questions.

Sincerely,



James Bearzi
Chief
Hazardous Waste Bureau

cc: R. Solomon, Acting Director, NMED WWMD
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