

CAFB

ENTERED



SUSANA MARTINEZ  
Governor

JOHN A. SANCHEZ  
Lieutenant Governor

**NEW MEXICO  
ENVIRONMENT DEPARTMENT**

***Hazardous Waste Bureau***

**2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303  
Phone (505) 476-6000 Fax (505) 476-6030  
[www.nmenv.state.nm.us](http://www.nmenv.state.nm.us)**



RYAN FLYNN  
Cabinet Secretary Designate

BUTCH TONGATE  
Deputy Secretary

TOM BLAINE, P.E.  
Director  
Environmental Health Division

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

October 22, 2013

Heather L. Buono, Colonel  
Commander, 27th Special Operations  
Mission Support Group  
27 SOMSG/CC  
110 E. Alison Avenue, Suite 1098  
Cannon Air Force Base, New Mexico 88103

**RE: APPROVAL WITH MODIFICATION  
2012 BIENNIAL GROUNDWATER MONITORING AND ANNUAL  
LANDFILL INSPECTION REPORT, LF-03, LF-04, LF-05, LF-25 AND  
FORMER SEWAGE LAGOONS  
CANNON AIR FORCE BASE  
CURRY COUNTY, NEW MEXICO  
EPA ID #NM7572124454  
HWB-CAFB-13-006**

Dear Colonel Buono:

The New Mexico Environment Department (NMED) has received the Cannon Air Force Base's (Permittee's) *2012 Biennial Groundwater Monitoring and Annual Landfill Inspection Report, LF-03, LF-04, LF-05, LF-25 and Former Sewage Lagoons* (Report) dated April 2013 and received July 30, 2013. NMED has completed its review of the Report and approves the Report subject to the following modifications.

**Modifications:**

1. The Permittee must comply with the recommendations in Sections 3.1.4, 3.2.4, 3.3.4, and 3.5.4 of the Report (*Future Activities*) by no later than **February 20, 2014**. The Permittee must provide letter notification to NMED by no later than **February 27, 2014** that the Permittee has complied with the recommendations.
2. The Permittee must update facility signage as discussed in Sections 3.3.3 and 3.5.3 (*Other Monitoring and Maintenance*) for LF-05 and the Former Sewage Lagoons, respectively, of the Report by no later than **February 20, 2014**. The Permittee must provide letter notification to NMED by no later than **February 27, 2014** that the facility signage has been properly updated.
3. Compliance with Directions 1 and 2 above may be achieved by submittal of a single letter provided the letter meets the substantive requirements of the modifications.
4. In Section 4.2 (*Groundwater Elevations*) of the Report, the Permittee has indicated that review of Figure 5 of the Report (*Groundwater Flow Map 10-15-12*) indicates a southwesterly flow component that is affected by a localized paleovalley. NMED does not agree with the Permittee that there is a southwesterly flow component shown on the Figure. No response to this modification is needed at this time but the collected data for the 2013/2014 Report must be carefully reviewed prior to submittal of the Report.
5. The Permittee must comply with each Recommendation (Report Section 6.0, *Recommendations*) listed in the Report.
6. In the 2013/2014 Report, the Permittee must provide a footnote to Table 1 (*Monitoring Well Construction Summary*) defining the term "NRF".
7. In the 2013/2014 Report, the Permittee must remove the footnote "TBD" from Table 2 (*Long-Term Monitoring for Groundwater Elevations*), since the term is not used in the Table.
8. With respect to Appendix C, *Groundwater Sampling Log*, in the 2013/2014 Report, the Permittee must remove references on the form to the Florida Department of Environmental Protection (top of form) and to Chapter 62-160 of Florida's Administrative Code (bottom of form).
9. Also with respect to Appendix C, *Groundwater Sampling Log*, in the 2013/2014 Report, the Permittee must ensure that all monitoring wells have well identification tags and locking well caps. Use of plastic bags in place of locking well caps is not an acceptable practice.

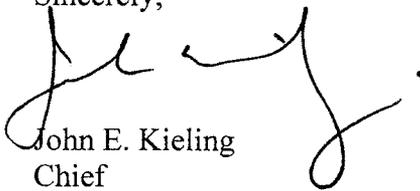
10. Appendix E, *Data Validation Summary Report*, Appendix E, Page 3, *Overall Summary of Data Usability*:

**Permittee's Statement:** "All samples were prepared and/or analyzed within the holding time required by the QAPP."

**NMED Comment:** This statement conflicts with the discussions in Section 5.3.1 (*Compliance with Monitoring Requirements*), Report page 5-4, last paragraph and Section 6.2 (Recommendations), third bulleted item, Report page 6-2, concerning exceedance of holding times for samples analyzed for hexavalent chromium. NMED expects this matter will be resolved prior to submittal of the 2013/2014 Report by changing the analytical method used for chemical analysis of hexavalent chromium.

If you have any questions regarding this letter, please contact Daniel Comeau at (505) 476-6043.

Sincerely,



John E. Kieling  
Chief  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
N. Dhawan, NMED HWB  
D. Comeau, NMED HWB  
L. King, EPA 6PD-N  
R. Lancaster, CAFB  
A. Lafuente, CAFB

File: CAFB 2013; Approval w/Direction, 2012 Biennial Groundwater Monitoring and Annual Landfill Inspections Report