



DEPARTMENT OF THE AIR FORCE
27TH SPECIAL OPERATIONS MISSION SUPPORT GROUP (AFSOC)
CANNON AIR FORCE BASE NEW MEXICO

ENTERED

24 February 2014

MEMORANDUM FOR NEW MEXICO ENVIRONMENT DEPARTMENT

RECEIVED

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

MAR 3 2014

NMED
Hazardous Waste Bureau

SUBJECT: Approval with Modification 2012 Biennial Report

1. In response to the NMED letter received on 22 October 2013 granting approval with modification of the 2012 Biennial Groundwater Monitoring and Annual Landfill Inspection Report, Cannon Air Force Base (CAFB) respectfully submits the following information.

2. NMED Requested Modifications: The Permittee must comply with the recommendations in Sections 3.1.4, 3.2.4, 3.3.4, and 3.5.4 of the [2012 Biennial Groundwater Monitoring and Annual Landfill Inspections] 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.

3.1.4 Future Activities

It is unclear if the new cap was seeded prior to the time of inspection or if there are plans for a ground cover in the future. Additionally, no silt fencing or temporary erosion prevention measures were in place to minimize wind distribution of cover material or sediment migration due to storm water.

Install a vegetative cover to maintain the integrity of the new soil cover and install erosion control measures until vegetative cover is mature. Continued annual inspections will verify that the cover system functions as designed and meets operational objectives. The need for routine maintenance or repair should be evaluated during these inspections.

No signage, fencing, or access gates were present at LF-03. At minimum, signage should be posted around the landfill.

CAFB Response: Natural processes have re-seeded the cover of LF-03 as shown in the attached photograph (Att. 3, Photo 1). In addition, signage was posted around LF-03 on 16 December 2013 (Att. 3, Photo 2). CAFB reports that the recommendations listed in Section 3.1.4 are complete. The 2013 required annual inspection was completed in December 2013.

3.2.4 Future Activities

It is unclear if the new cap was seeded prior to the time of inspection or if there are plans for a ground cover in the future. Additionally, no silt fencing or temporary erosion prevention measures were in place to minimize wind distribution of cover material or sediment migration due to stormwater.

Install a vegetative cover to maintain the integrity of the new soil cover and install erosion control measures until vegetative cover is mature. Continued annual inspections will verify that the cover system functions as designed and meets operational objectives. The need for routine maintenance or repair should be evaluated during these inspections.

No signage, fencing, or access gates were present at LF-04. At minimum, signage should be posted around the landfill.

CAFB Response: Signage was posted around LF-04 on 16 December 2013 (Att. 3, Photo 3). Erosion repairs were made to the rip-rap section of the landfill (Att. 3, Photo 4). The additional erosion control measures were met by placing soil stabilizer on the surface to prevent further erosion. CAFB is requesting an extension until June 2014 to complete the re-seeding of LF-04 to ensure appropriate temperature to support germination. The 2013 required annual inspection was completed in December 2013.

3.3.4 Future Activities

Continued annual inspections will verify that the cover system functions as designed and meets operational objectives. The need for routine maintenance or repair should be evaluated during these inspections.

CAFB Response: LF-05 was inspected during the December 2013 annual inspection. CAFB reports that the recommendations listed in Section 3.3.4 are complete.

3.4.4 Future Activities

Continued annual inspections will ensure the cover system functions as designed and meets operational objectives. The need for routine maintenance or repair should be evaluated during these inspections.

Appropriate signage was in place but requires updating to reflect the correct contact information for the Base Civil Engineer Environmental Office.

CAFB Response: Signs at LF-25 were updated and replaced (Att. 3, Photo 5). The 2013 required annual inspection was completed in December 2013.

3.5.4 Future Activities

Continued annual inspections will ensure the cover system functions as designed and meets operational objectives. The need for routine maintenance or repair should be evaluated during these inspections.


CAFB Response: Former Sewage Lagoons were inspected on December 2013. CAFB reports the recommendations listed in Section 3.5.4 are complete.

3. NMED also stated 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 Permittee has complied with the recommendations.

CAFB Response: Signs at LF-05 and the Former Sewage Lagoons were updated and replaced on 16 December 2013 (Att. 3, Photos 6 and 7).

4. Per the 22 October 13 approval letter, 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.

5. Cannon Air Force Base looks forward to working with you and making sure these modifications reach final approval. If you have any questions regarding this letter, please contact Mr. Ronald Lancaster, Chief, Installation Management Flight at (575) 784-1146.


HEATHER L. BUONO, Colonel, USAF
Commander

3 Attachments:

1. CAFB Report: 2012 Biennial Groundwater Monitoring and Annual Landfill Inspection
2. NMED Response Letter
3. Compliance Photos

Received 21 OCT 13 (13)



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Governor

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Lieutenant Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

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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.

Col. Heather Buono
October 22, 2013
Page 3

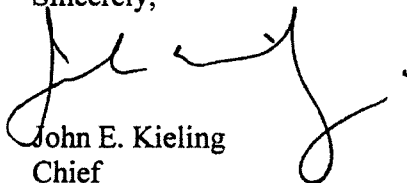
10. Appendix E, *Data Validation Summary Report*, Appendix E, Page 3, *Overall Summary of Data Usability*:

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