



SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT



ENTERED



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

RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 25, 2015

Heather L. Buono, Colonel
Commander, 27th Special Operations Mission
Support Group
27 SOMSG/CC
110 E. Alison Avenue, Suite 1098
Cannon AFB, NM 88103

**RE: DISAPPROVAL
2014 BIENNIAL GROUNDWATER MONITORING AND ANNUAL LANDFILL
INSPECTION REPORT, CANNON AIR FORCE BASE, DECEMBER 2014
EPA ID# NM7572124454
HWB-CAFB-15-002**

Dear Col. Buono:

The New Mexico Environment Department (NMED) received the *2014 Biennial Groundwater Monitoring and Annual Landfill Inspection Report, Cannon Air Force Base* (Report), dated December 2014 on January 5, 2015. NMED has reviewed the Report and hereby issues this Disapproval with the following comments.

1. The Report states that two water level measuring events were completed in June 2014 and July 2014. Explain why water levels were not measured in 2013, though Section 2.2.1 of the *Facility-Wide Long Term Groundwater Monitoring Plan* dated January 2011 states that water levels will be measured on an annual basis.
2. Comparing water elevation changes using two different top of casing (TOC) measurements is potentially inaccurate and misleading. The water elevation changes should be calculated using the same TOC measurement, taking into account differences in casing height for wells MW-E, MW-F, MW-G, and MW-H. Add columns to Table 4-1 showing the difference in water level measurements between June and July, and the difference in historical and surveyed TOC elevations. Discuss the differences in the text.
3. The summary table of analytical results for the past four sampling events must be submitted to NMED in Microsoft Excel format, per Section 4.2 of the *Facility-Wide Long Term*

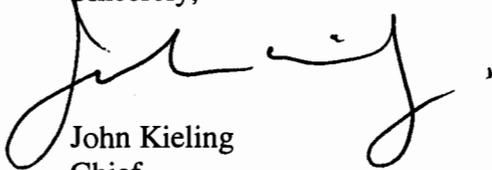
Groundwater Monitoring Plan dated January 2011. The included CD only contained a pdf version of the report. Include the data in Excel format.

4. Table 1 of the Report, Table 1 (Monitoring Well Construction Summary) in the 2012 *Biennial Report*, and Table 1 (Well Construction Details) in the *Facility-Wide Long Term Groundwater Monitoring Plan* dated January 2011 contain different and sometimes conflicting data concerning the monitoring wells. Resolve the discrepancies and include well construction logs for all monitoring wells in an appendix of the Report.
5. Explain why Table 1 of the Report shows that top and bottom screen depths of MW-Na are unknown when the screen depths for this well are provided in the 2012 *Biennial Report*.
6. Apparently, monitoring wells MW-A through MW-H were constructed with screens far below the water table, such that even with the water table dropping approximately 50 feet in 22 years, the water table during the July 2014 measurement was between 11 and 38 feet above the top of the screen in all eight wells. Describe the potential effects of sampling groundwater significantly below the water table.

The Permittee must submit a revised Report to address all of the comments contained in this Disapproval. The revised Report must be accompanied by a response letter that details where each comment was addressed that cross-references NMED's numbered comments. The Permittee must also submit an electronic redline-strikeout version of the Report that shows where all changes were made to the report. The revised Report must be submitted no later than **June 15, 2015**.

If you have any questions regarding this letter, please contact Naomi Davidson at (505) 476-6022.

Sincerely,



John Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
N. Davidson, NMED HWB
N. Dhawan, NMED HWB
B. Chavez, CAFB
R. Lancaster, CAFB
L. Peters, CAFB

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