



State of New Mexico
ENVIRONMENT DEPARTMENT



Hazardous Waste Bureau

SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6313
Phone (505) 476-6000 Fax (505) 476-6030
www.env.nm.gov

BUTCH TONGATE
Cabinet Secretary
J. C. BORREGO
Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

January 17, 2018

Colonel Stewart A. Hammons
Commander, 27th Special Operations Wing
110 E. Alison Avenue, Suite 1098
Cannon Air Force Base
New Mexico 88103

**RE: APPROVAL WITH MODIFICATION
FINAL ANNUAL LONG-TERM MANAGEMENT AND LAND USE CONTROL
COMPLIANCE REPORT FOR SITES LF001 AND LF005
CANNON AIR FORCE BASE, NEW MEXICO
EPA ID #NM7572124454
HWB-CAFB-17-009**

Dear Col. Hammons:

The New Mexico Environment Department (NMED) is in receipt of the Cannon Air Force Base (Permittee) *Final Annual Long-Term Management and Land Use Control Compliance Report for Sites LF001[Landfill No. 001] and LF005[Landfill No. 005]* (Report), dated July 17, 2017 and received July 27, 2017. NMED has reviewed the Report and hereby issues this Approval with the following modification.

MODIFICATION

1. Section 4.0, Conclusions and Recommendations, Page 4-1 through 4-2

NMED Comment: All necessary long-term management (LTM) maintenance and repair activities required to mitigate erosion of the landfill cover and regular Land Use Control (LUC) inspection activities at the eastern and western portions of LF005 may be performed under the applicable provisions outlined in Section Six, Landfill Inspections, Maintenance, and Repair, of the NMED approved September 2014 *Final Work Plan Addendum for*

Landfills and Institutional Control Inspection Sites (Landfills Institutional Controls Work Plan). Based on the extensive nature of the required maintenance and repair activities at LF005, the results of any outstanding landfill maintenance and repair activities must be documented and submitted to NMED in a status report. The status report must be submitted to NMED no less than **120 days** after either completion of the necessary maintenance and repair activities as outlined in the Report or receipt of NMED's response to the Report, if the Permittee has completed the necessary landfill maintenance and repair under its own initiative as required by the Landfills Institutional Controls Work Plan.

Based on the information provided in the Report, the following outstanding maintenance, repair, investigation, and inspection activities must be completed and documented in the required status report:

- Backfilling and revegetation of two erosion features (Erosion Features No. 1 and 2) and 50 subsidence features (Subsidence Features Nos. 1 through 50);
- Excavation of all animal burrows to discourage further burrowing at the site;
- Collection of exposed debris and rubble from thirty-six locations and placement in erosion or subsidence features designated for backfill at LF005 only;
- Removal of all tree growth identified within the perimeter of LF005 (western and eastern portions);
- Performance of an additional qualitative investigation of four soil piles identified at LF005. The results of the investigation must include the identification of the origin of the soil pile materials to the extent practicable, a concise description of the soil pile matrix and any associated debris, any evidence of a release of contaminants to the environment identified in association with the soil piles, and supporting photographic and field note/observation documentation;
- Cover in place with backfill all partially buried debris and rubble which cannot be removed/collected;
- Installation of a fence along the western portion of LF005 with proper signage that limits entry and/or disturbance of the western portion of the landfill. Additionally, the establishment of vegetation followed by regular mowing, inspection, and erosion feature maintenance and repair activities must be implemented at the western portion of LF005;
- Mowing of the eastern portion of LF005 must continue as necessary;
- Inclusion of any recently collected information pertaining to investigative project work conducted during the evaluation of subsidence features at LF001 and LF005 in the status report, such as geophysical surveys, landfill boundary and elevation

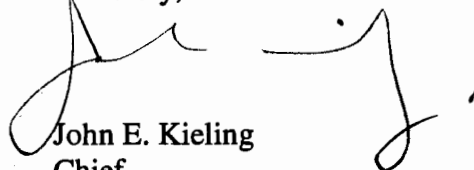
survey information, and any other additional investigation information which was not provided in the Report;

- Inclusion of information in the status report documenting any additional soil sample analysis results for backfill materials utilized to fill subsidence and erosion features across the site, as well as final volume reconciliation information.

NMED understands no maintenance or repair activities were necessary at LF001 based on the results of LUC inspection documented in the Report. LF001 is currently maintained as a portion of the 14th, 15th, and 17th fairways of the Cannon Air Force Base Whispering Winds Golf Course. Annual LUC compliance inspection and necessary LTM maintenance and repair activities must be implemented at LF001 under the applicable provisions of the currently approved Landfills Institutional Controls Work Plan and the results reported in the Biennial Groundwater Monitoring and Annual Landfill Inspection Report.

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

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED
B. Wear, NMED HWB
G. Acevedo, NMED HWB
L. King, EPA Region 6 (6MM-RC)
A. Lafuente, CAFB
R. Lancaster, CAFB
S. Kottkamp, CAFB
S. Palmer, CAFB
D. Gentry, CAFB

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