



Michelle Lujan Grisham
Governor

Howie C. Morales
Lt. Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Hazardous Waste Bureau

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



ENTERED



James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 15, 2021

Colonel Robert A. Masaitis
Commander, 27th Special Operations Wing
100 Air Commando Way, Suite 100
Cannon Air Force Base
New Mexico 88103-5214

**RE: APPROVAL
EXTENSION REQUEST FOR FACILITY-WIDE GROUNDWATER MONITORING PLAN
CANNON AIR FORCE BASE, NEW MEXICO
EPA ID #NM7572124454
HWB-CAFB-19-003**

Dear Colonel Masaitis:

The New Mexico Environment Department (NMED) has received the Cannon Air Force Base (Permittee) time extension request for submittal of the *Facility-Wide Groundwater Monitoring Plan* (Monitoring Plan) dated January 13, 2021. The Permittee's request is in response to NMED's December 2, 2020 *Disapproval Work Plan Addendum Facility-Wide Long-Term Monitoring, Maintenance, and Inspection at Multiple Sites* (Disapproval).

The initial requirement for submittal of the Monitoring Plan was provided in NMED's March 19, 2019 *Interim Facility-Wide Long-Term Groundwater Monitoring Plan* correspondence to the Permittee and required submittal of the Monitoring Plan no later than July 1, 2019. On June 20, 2019, the Permittee requested a time extension for submittal of the Monitoring Plan that proposed a due date of December 28, 2019. NMED approved a time extension on July 1, 2019 and granted a revised submittal date of September 30, 2019. Instead of providing the required Monitoring Plan, the Permittee submitted the *Work Plan Addendum Facility-Wide Long-Term Groundwater Monitoring Plan* (WPA) on September 26, 2019 to NMED for review.

On December 2, 2020, NMED issued a Disapproval to the WPA and clarified that the WPA did

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not satisfy the requirement for the Permittee to submit an updated Facility-Wide Long-Term Groundwater Monitoring Plan. To date, the Permittee has had twenty months to award the necessary contract for implementation of the project work.

Continued Facility-wide groundwater monitoring is essential to the collection of groundwater data from the regional aquifer underlying Cannon Air Force Base (CAFB) and serves as an interim measure for corrective action required at various solid waste management units (SWMUs) and areas of concern regulated under the CAFB 2018 Corrective Action Only RCRA Hazardous Waste Permit (Permit). Required annual inspection of landfills designated as SWMUs and currently conducted under the NMED-Approved January 2011 *Facility-Wide Long-Term Monitoring Plan* and the June 2014 *Final Work Plan Addendum for Landfills and Institutional Control Inspection Sites* is also essential to ensure land use controls and landfill covers are maintained at each site. Regular groundwater monitoring and inspection of landfills designated as SWMUs is required to ensure the protection of human health and the environment at CAFB.

The Permittee's currently proposed April 30, 2022 time extension request is excessive and may potentially affect the continuity of the required groundwater monitoring and SWMU inspections at CAFB. Therefore, to ensure that groundwater monitoring and SWMU inspections continue at CAFB, as well as to allow for additional time for the Permittee to respond to NMED's Disapproval and address any related work scope contracting matters, the updated Monitoring Plan must be submitted to NMED no later than **July 31, 2021**.

If you have any questions regarding this letter, please contact Gabriel Acevedo at (505) 690-5760.

Sincerely,

Digitally signed by Kevin
Pierard
Date: 2021.03.15 10:15:37
-06'00'

Kevin M. Pierard, Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
B. Wear, NMED HWB
G. Acevedo, NMED HWB
L. King, EPA Region 6 (6LCRRC)
C. Gierke, CAFB
C. Soto-Lorenzo
S. Jennings
J. Burgoon

File: CAFB 2021 and Reading