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Department of the Air Force
27th Special Operation Civil Engineer Squadron
Cannon Air Force Base – New Mexico
Attn. Lylya Granfield
506 North Air Commando Way
Cannon AFB, NM 88103-5108

Submitted electronically to: Lylya Granfield at 27SOCES.CEIE.Environmental@us.af.mil

RE: Draft Environmental Assessment to evaluate impacts associated with Wastewater and Stormwater Infrastructure Improvement Project at Cannon Air Force

Respected Mrs. Granfield,

On behalf of the New Mexico Environment Department (NMED), attached please find our comments on the request for review of the Draft Environmental Assessment to evaluate impacts associated with the Wastewater and Stormwater Infrastructure Improvement Project at Cannon Air Force.

Strong intergovernmental coordination is essential to ensure protection of human health and the environment. NMED offers a few areas of potential environmental impacts in the attachment for you to evaluate.

Thank you for providing the opportunity to review the project materials. Please reach out to us with any further questions or concerns you may have. We ask that you send all comment requests to env.review@env.nm.gov, it helps expedite a timely review of your request.

Sincerely,

Claudia Trueblood, Ph.D.
Science Coordinator
Office of Strategic Initiatives

Attachment (1)

Attachment

Background

The United States Air Force prepared a Draft Environmental Assessment to evaluate the potential environmental impacts associated with wastewater and stormwater infrastructure improvement projects at Cannon Air Force Base (CAFB), New Mexico. The proposed action is to replace two golf course impoundment liners and repair the six culverts on the South Playa. The project will allegedly prevent possible seepage of reclaimed water into the ground, which could be a threat to water quality and wildlife.

Comments

Air Quality

The Air Quality Bureau supports the project to replace two golf course impoundment liners and repair the six culverts on the South Playa at CAFB. It is unclear if the existing culverts could contain asbestos cement pipe. When portions of existing culverts and pipes are physically disturbed, demolished, or removed for replacement, there is always a concern that asbestos could be released into the air.

We recommend an asbestos survey to determine if regulated asbestos-containing material (RACM) exists in the culvert and pipes. If an asbestos survey is done, it must be conducted by a qualified professional and must demonstrate that all potential asbestos containing materials at the demolition site have been tested. The survey must be conducted within three years of the start of the asbestos removal. In addition to the survey, complete the Asbestos NESHAP (National Emission Standards for Hazardous Air Pollutants) Notification form (<https://www.env.nm.gov/forms/>). Submit a copy of the asbestos survey and the Asbestos NESHAP Notification form to the Air Quality Bureau at least 10 working days before demolition begins. You may scan and email (preferred), fax, or mail your signed and dated forms. Please do not send duplicate copies of the notice to the Bureau.

Any construction activities associated with the replacement of impoundment liners and the repair wastewater or stormwater culverts on the South Playa may cause temporary increases in dust and emissions from earthmoving, construction equipment, and other vehicles. Dust control measures should be taken to minimize the release of particulates due to vehicular traffic and construction.

Drinking Water

The Drinking Water Bureau supports the proposed wastewater and stormwater infrastructure improvements at CAFB. Replacement of synthetic liners at the two golf course impoundments will aid in preventing seepage and potential contamination of groundwater that locally flows to the southeast toward as many as five public drinking water wells used by the CAFB Water System (Public Water System No. NM3567905).

Groundwater

The Ground Water Quality Bureau supports the project to replace the golf course impoundment synthetic liners and repair culverts at the South Playa Lake at CAFB. Under Phase 3 of the liner replacement, CAFB states that the sediment above the liner will be removed and prior to removal sampled for PFAS; however, CAFB does not then specify how the results of the PFAS sampling of the sediment will inform how the

sediment will be disposed. Since the sediment on top of the liner contains organic materials and wastewater treatment plant sludge, all the sediment needs to be treated as sludge and disposed of in accordance with 40 CFR Part 503, unless the PFAS results require it to be disposed of in another manner.

Petroleum Storage Tanks

The request does not contain any action that will impact storage tank systems currently regulated under 20.5 NMAC and does not propose the installation of new storage tank systems. There are currently 13 active facilities on CAFB, they are listed below:

FID	Facility	Street	AST	UST
53066	TANK 280A	FACILITY 280	1	0
53067	TANK 280B	FACILITY 280B	1	0
53069	AFFES EXPRESS	108 N EAGLE CLAW BLVD	0	3
54596	AGE COMPLEX BLDG #850	113 E OCTAGON	1	0
54815	FUELS YARD	602 N CHINDIT	4	0
54816	AIRFIELD (RUNWAY 04/22)	602 N CHINDIT	1	0
54817	551ST SOS	119 E COCHRAN AVENUE	1	0
54818	SECURITY FORCES	122 E COCHRAN AVENUE	1	0
54820	BASE OPERATIONS	207 W ALISON AVENUE	1	0
54821	3RD SOS	208 S CHINDIT BLVD	1	0
54822	AIRFIELD/AIRFIELD LIGHTS	211 E ALBRIGHT AVENUE	1	0
54825	WASTE WATER TREATMENT PLANT	413 N ANDERHOLT LOOP	1	0
54843	AIRCRAFT MAINT SQUADRON (GPMX)	128 SOUTH DAGGER BLDG 4617	1	0

There are no confirmed release sites that are active or have a “no further action” status directly associated with the project area property. Two release sites are located a half mile away to the east of the Golf Course Impoundment Liner Replacement Project Area. No address is listed for either site but both sites are between Whispering Winds Golf Course and Cannon AFB Visitor Center:

1. Facility 10, Release name - BLDG 10, Facility Name - Tank 10 (Facility ID 30933 Release ID 2434), has a status of Cleanup, Federal Facility.
2. Facility 1400 A, Release Name - Facility #1400-Hospital, Facility Name – Tank 1400 A (Facility ID 30938 Release ID 2415), has a status of Investigation, Federal Facility.

Several release sites with no physical address in the database but are listed as being at Cannon AFB and may affect both the Golf Course Impoundment Liner Replacement Project Area or the South Playa Culvert Repair Project Area are listed below:

1. Facility 1402, Release Name -1402 Sewage Lift STA, Facility Name – Tank 1402 (Facility ID 30940 Release ID 2398), has been referred to Groundwater Quality Bureau.
2. Facility 2110, Release Name - BLDG/FAC 2110, Facility Name - Tank 2110 (Facility ID 30948 Release ID 2432), has a status of Cleanup, Federal Facility.

3. Facility 728, Release Name - Facility 728, Facility Name - Tank 728 (Facility ID 30990 Release ID 2439), has a status of Investigation, Federal Facility.
4. Facility 600, Release Name - BLDG 600, Facility Name - Tank 600 (Facility ID 30989 Release ID 2445), has a status of Investigation, Federal Facility.
5. Facility 3060, Release Name - Facility #3060, Facility Name - Tank 3060 (Facility ID 30964 Release ID 2500), has a status of Investigation, Federal Facility.
6. Facility 368 A, Release Name -BLDG 368, Facility Name - Tank 368 A (Facility ID 30970 Release ID 2529) and has a status of Investigation, Federal Facility.
7. Facility 130, Release Name - Facility 130, Facility Name - Tank 130 (Facility ID 30935 Release ID 2520), has a status of Investigation, Federal Facility.
8. Facility 2285, Release Name - BLDG 2285, Facility Name - Tank 2285 (Facility ID 30953 Release ID 2530), has a status of Investigation, Federal Facility.
9. One site located 1/5 mile to the east, has a no further action status – no physical address listed (located near Cannon AFB Visitor Center) for:
10. Facility 392 A, Release Name - Facility 392, Facility Name – Tank 392 A (Facility ID 30977 Release ID 843) the date NFA status was given is unknown.

Surface Water Quality

The Surface Water Quality Bureau supports the project to replace the golf course impoundment synthetic liners and repair culverts at the South Playa Lake at CAFB.

Construction activities may affect Surface Waters of the State as defined in 20.6.4.7 NMAC, which includes intermittent arroyos and playas within the project construction area. Playas are arroyos subject to 20.6.4.98 NMAC. Furthermore, operations must ensure, at all times, protection of surface waters of the state including General Criteria at 20.6.4.13 NMAC, established to sustain and protect existing or attainable uses of surface waters of the state. Surface waters of the state shall be free of any water contaminant in such quantity and of such duration to avoid the probability of injuring human health, animal or plant life or property, or unreasonably interfering with the public welfare or the use of property.

The Applicant is required to report all spills immediately to the NMED as required by the New Mexico Water Quality Control Commission regulations (20.6.2.1203 NMAC). For non-emergencies during normal business hours, call 505-428-2500. For non-emergencies after hours, call 866-428-6535 or 505-428-6535 (voice mail, twenty-four hours a day). For emergencies only, call 505-827-9329 twenty-four hours a day (NM Dept of Public Safety).

In addition to the above regulatory standards, SWQB requires the following practices to avoid contamination and to protect surface and groundwater quality:

- Fuel, oil, hydraulic fluid, lubricants, and other petrochemicals must have a secondary containment system to prevent spills. Store these materials outside of the flood-prone zone.
- Perform all work, when practicable, in the dry season and postpone work during wet and muddy conditions.
- Appropriate spill clean-up materials such as absorbent pads must be available on-site at all times during road construction, site preparations, drilling and reclamation to address potential spills.