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CAFB 05



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CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

July 19, 2005

Colonel John D. Posner  
Commander 27<sup>th</sup> Fighter Wing  
100 D.L. Ingram Boulevard  
Cannon Air Force Base, New Mexico 88103-5214

**SUBJECT: CORRECTIVE MEASURES STUDY FOR  
SITE SD-11 (SWMUs 86-90)  
EPA ID NO. NM7572124454  
HWB-CAFB-03-001**

Dear Colonel Posner:

The New Mexico Environment Department (NMED) has completed its review of Cannon Air Force Base's (CAFB) *Corrective Measures Study for Site SD-11*, dated July 1999 and the subsequent July 25, 2001 addendum. NMED considers this document to be a supplemental RCRA Facility Investigation (RFI) report and it is hereby approved. However, after the technical review, NMED has determined that additional work is required before the Solid Waste Management Units (SWMUs) at the site can be considered for No Further Action (NFA).

The following comments comprise NMED's technical review of CAFB's CMS.

**COMMENT 1**

Data submitted by CAFB reported detections of jet fuel contamination in the former oil/water separator area at levels above current NMED Total Petroleum Hydrocarbon (TPH) guidance. The highest levels of contamination are directly below the limit of excavation between approximately eight (8) and twenty (20) feet below ground surface (bgs).

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TPH screening guidelines must be used in conjunction with the screening levels for specific petroleum-related constituents. Please consult Hazardous Waste Bureau's (HWB) TPH guidance at the following address:

[http://www.nmenv.state.nm.us/hwb/data/NMED\\_Total\\_Petroleum\\_Hydrocarbon\\_\(TPH\)\\_Screening\\_Guidelines\\_6-24-2003.pdf](http://www.nmenv.state.nm.us/hwb/data/NMED_Total_Petroleum_Hydrocarbon_(TPH)_Screening_Guidelines_6-24-2003.pdf)

**COMMENT 2**

CAFB must remove contaminated soil that contains petroleum hydrocarbons at concentrations above the standards described in COMMENT 1. Confirmatory soil samples must be analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), TPH (as gasoline-range and diesel-range organics), and Resource Conservation and Recovery Act (RCRA) metals. In addition, an adequate number of confirmation samples must be collected to demonstrate that contaminated soils have been removed before the excavation pit is backfilled with clean soil.

**COMMENT 3**

CAFB indicates, in Section 8 of the CMS Report that various metals exceed background concentrations and that other metals were detected at or below background concentrations. Upon review of the analytical data, metals detected in the soil were below NMSSLs.

CAFB may first compare detected concentrations of inorganic constituents to the New Mexico Soil Screening Levels (NMSSLs) before the detected concentrations are compared to site-specific background values. When a specific constituent is not listed in the NMSSLs, then CAFB must use the residential values listed in the Environmental Protection Agency's (EPA) Region 6 Human Health Medium-Specific Screening Levels.

NOTE: CAFB must have NMED-approved site-specific background values for comparison to site-specific analytical data.

**COMMENT 4**

Laboratory data sheets from the 1995 Phase III RCRA Facility Investigation (RFI) indicate that samples were not analyzed for cadmium, silver, and selenium. In the future, CAFB must analyze for and report all RCRA metals, as well as all other relevant constituents analyzed.

**COMMENT 5**

CAFB must not use contaminated soils to fill excavations. Mixing of clean and contaminated soils constitutes dilution of contamination and can contribute to ground water and subsurface soil contamination.

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**COMMENT 6**

Laboratory reporting limits must always be below the applicable clean up standards. For example, Table B-1 shows a reporting limit for benzidine was 1900 µg/kg when the NMSSL for benzidine is 21.1 µg/kg. NMED requires that the methods detection limits be included in all laboratory reports and also be listed on the summary data tables.

**COMMENT 7**

CAFB must submit a work plan for remedy implementation within ninety (90) days of receipt of this letter. The work plan must detail how CAFB intends to conduct and confirm remedial actions at Site SD-11.

If you have any questions concerning this letter, please contact me at 505-428-2550.

Sincerely,



Cheryl Frischkorn  
Hazardous Waste Bureau

CAF:caf

cc: J. Kieling, NMED HWB  
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