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27TH SPECIAL OPERATIONS WING (AFSOC)
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Dear Mr. Bearzi

Cannon AFB respectfully submits two copies of the Final Corrective Measure Implementation (CMI) Work Plan for Solid Waste Management Unit (SWMU) 48a, Site ST-26a and Area of Concern (AOC) 36 located at CAFB for your review and records. This document is provided in response to your 21 Dec 06 letter containing NMED review comments for SWMU 48a only of the Final Corrective Measures Study Report for SWMU 31, 48a, 77, and 127, June 00. SWMUs 31, 77, and 127 will be addressed together under another project separate from Sites ST-26a and AOC 36.

Please inform us of what further action, if any, will need to be taken. If you have any questions, please contact Ms. Kristi L. Doll at (505) 784-1091.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.


TIMOTHY J. LEAHY, Colonel, USAF
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Attachment:
Final CMI Work Plan for Site ST-26 (SWMU 48a) and AOC 36 dated August 2007

cc:
NMED (D. Cobrain) w/1 copy
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FINAL

**SITE ST-26 (SWMU 48A) and AOC 36
CORRECTIVE MEASURES IMPLEMENTATION
WORK PLAN
CANNON AIR FORCE BASE, NEW MEXICO**

AFCEE Contract No. FA8903-04-D-8679
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Project No. CZQZ20077926L

Prepared for:



United States Air Combat Command



Cannon Air Force Base, New Mexico

Under contract to:



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List of Acronyms

27 CES	27 th Fighter Wing, Civil Engineering Squadron
27 CES/CEV	27 th Fighter Wing, Civil Engineering Squadron, Environmental Flight
AFB	Air Force Base
AFCEE	Air Force Center for Environmental Excellence
AOC	Area of Concern
BTEX	Benzene, toluene, ethylbenzene, xylenes
bgs	below ground surface
CAD	computer-aided design
CDL	commercial drivers license
CDRL	Contract Data Requirements List
CFR	Code of Federal Regulations
CMI	Corrective Measures Implementation
CMS	Corrective Measures Study
CoC	chain-of-custody
COC	chemical of concern
CRQL	Contract-Required Quantification Limit
CRZ	contaminant reduction zone
cy	cubic yard
DQCR	Daily Quality Control Report
DQO	data quality objective
ERP	Environmental Restoration Program
eV	electron Volt
EZ	exclusion zone
FIPS	Federal Information Processing Standard
FSP	Field Sampling Plan
gpm	gallon per minute
HAZWOPER	Hazardous Waste Operations and Emergency Response
HSM	Health and Safety Manager
HSP	Health and Safety Plan
IDW	investigation-derived waste
IRP	Installation Restoration Program
MCL	maximum contaminant level

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MDL	master document list
MEK	2-butanone
mg/kg	milligram/kilogram
MS/MSD	matrix spike/matrix spike duplicate
msl	mean sea level
MWR	Morale, Welfare and Recreation
NAD83	North American Datum of 1983
NFA	No Further Action
NMED	New Mexico Environmental Department
NPDES	National Pollutant Discharge Elimination System
OSHA	Occupational Safety and Health Administration
PID	photoionization detector
PM	Project Manager
POL	Petroleum, Oil and Lubricant
PPE	Personal protective equipment
QA/QC	quality assurance/quality control
QAPP	Quality Assurance Project Plan
QPP	Quality Program Plan
RBC	Risk-Based Concentration
RCRA	Resource Conservation Recovery Act
RFA	RCRA Facility Assessment
RFI	RCRA Facility Investigation
RI	Remedial Investigation
SAP	Sampling and Analysis Plan
SCFS	Sample Collection Field Sheet
SHSO	Site Health and Safety Officer
SMS	Safety Management Standard
SWMU	solid waste management unit
SOP	standard operating procedure
SSL	soil screening level
SVOC	semivolatile organic compound
SZ	support zone
TAL	Target Analyte List

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TCL	Target Compound List
TCLP	Toxicity Characteristic Leaching Procedure
TO	Task Order
TPH	total petroleum hydrocarbon
TPH-DRO	TPH–diesel range organics
TPH-GRO	TPH–gasoline range organics
TRPH	total recoverable petroleum hydrocarbon
URS	URS Group, Inc.
USEPA	United States Environmental Protection Agency
UST	Underground storage tank
USGS	United States Geological Survey
VOC	volatile organic compound

This Corrective Measures Implementation (CMI) Work Plan addresses the procedures for evaluating risks and for identifying and removing contaminated media from Site ST-26 [Solid Waste Management Unit (SWMU) 48A] and Area of Concern (AOC) 36 at Cannon Air Force Base (AFB), New Mexico. SWMUs 31, 77, and 127 were addressed with SWMU 48A as part of a Corrective Measures Study (CMS) (URS 1999). SWMUs 31, 77 and 127 will be addressed together, under another project separate from Site St-26 and AOC 36. This CMI Work Plan has been prepared by URS Group, Inc. (URS) for the Air Force Center for Environmental Excellence (AFCEE) under Task Order (TO) 0079, Contract FA8903-04-D-8679 (Reference project number CZQZ20077926L).

1.1 OVERVIEW OF THE PLANNED CORRECTIVE MEASURES

The CMI will be accomplished through five tasks, as follows:

- Respond to the New Mexico Environmental Department (NMED) comments and prepare this CMI Work Plan
- Re-evaluate previous analytical results
- Complete CMI field investigation included in this Work Plan
- Complete CMI construction activities, as necessary
- Prepare Site Closure Report or No Further Action (NFA) proposal

1.2 FORMAT OF THE CMI WORK PLAN

This CMI Work Plan is a stand-alone document for Sites ST-26 and AOC 36 and has been prepared in accordance with the requirements for an Environmental Cleanup Plan [Contract Data Requirements List (CDRL) A004]. This CMI Work Plan summarizes and provides details on the planned CMI field investigation and the implementation of the corrective measures at Site ST-26 and AOC 36. Since the Work Plan addresses similar contamination and fall under the same task order, a separate Field Sampling Plan (FSP) was unnecessary. The elements of a FSP are included throughout this Work Plan, particularly in **Section 5**. The Work Plan is organized as follows:

- **Section 1** – Introduction
- **Section 2** – Project Background and Corrective Measure Objectives: Presents a site description, summarizes previous environmental investigation results, and describes the corrective measures objectives
- **Section 3** – Project Roles: Summarizes the roles each organization will have in the CMI
- **Section 4** – Data Quality Objectives: Specifies the quality of data and defines the level of certainty required to support corrective measure decisions

- **Section 5** – CMI Investigation Procedures: Discusses the scope of the CMI investigation, including activities and procedures for site access and digging permit, data collection, sample handling and identification, surveying, and decontamination and investigation-derived waste (IDW)
- **Section 6** – CMI Removal Action Scope of Work: Discusses the scope of the potential CMI construction activities, including pre-mobilization and mobilization activities, excavation limits and activities, confirmatory sampling and analysis, backfill and restoration, final inspection, and demobilization
- **Section 7** – Waste Management, Transportation, and Disposal Plan: Describes the anticipated wastes and management procedures, waste characterization sampling, storage, transportation and disposal, and documentation requirements
- **Section 8** – Project Documentation and Reporting: Summarizes project monitoring and reporting requirements
- **Section 9** – Anticipated Project Schedule: Presents a preliminary schedule for the CMI
- **Section 10** – References: Summarizes the documents referenced in this work plan

Space for the following appendices, which may be developed as part of future updates to this work plan, is also included in this CMI Work Plan:

- **Appendix A** – Health and Safety Plan (HSP) [CDRL A005]
- **Appendix B** – Quality Assurance Project Plan (QAPP)
- **Appendix C** – Standard Operating Procedures (SOPs)

The Quality Program Plan (QPP) for this project will be comprised of this CMI Work Plan, together with the HSP (included as **Appendix A**) and the QAPP (included as **Appendix B**).

SECTION TWO

Project Background and Corrective Measure Objectives

2.1 SITE DESCRIPTION

Cannon AFB is situated in the Southern High Plains Physiographic Province in the Llano Estacado subprovince, which is a nearly flat plain that slopes gently to the east and southeast. Soil types include Amarillo fine sandy loams and Clovis fine sandy loams. Caliche is often present at depths greater than 5 feet. The depth to groundwater exceeds 250 feet below ground surface (bgs).

2.1.1 Site ST-26 (SWMU 48A)

Site ST-26 included a 20,000-gallon underground storage tank (UST) located approximately 125 feet east of the intersection of Argentia Avenue and Torch Boulevard. The tank and associated piping were removed in 1988. The area is presently paved and used as a parking lot. The depth of the former tank is unknown, but residual contaminants have been detected at depths up to 30 feet bgs. Topography is generally flat with an approximate elevation of 4,300 feet above mean sea level (msl). The location of Site ST-26 is shown on **Figure 2-1**.

2.1.2 Area of Concern (AOC) 36

Site AOC 36 is an area of potentially contaminated soil identified approximately 72 feet southeast of the current Morale, Welfare and Recreation (MWR) Outdoor Recreation Center building 214. The site of possible contamination is currently covered by an asphalt parking lot. The location of AOC 36 is shown on **Figure 2-2**.

2.2 SITE GEOLOGY AND GROUNDWATER

2.2.1 Generalized Geology

In the vicinity of Cannon AFB, Late Miocene to Late Pliocene Ogallala Formation sediments overlie Early Triassic Dockum Group sedimentary rocks. The upper part of the Dockum Group consists mostly of red shale interbedded with minor sandstone. The top of the Dockum Group is marked by an erosional unconformity that has several hundred feet of relief.

The Ogallala Formation is 360 to 415 feet thick near Cannon AFB and consists of poorly sorted (well graded) gravel, sand, silt, and clay. The base of the Ogallala Formation generally consists of gravel, cobbles, and boulders. In many places, the Ogallala sediments are loose and friable; however, caliche is a major feature of the Ogallala Formation. Caliche is a hard, white to pale tan accumulation of calcium carbonate cement in the pore spaces of the Ogallala sediments. There are numerous continuous and discontinuous caliche layers throughout the Ogallala Formation (Lee Wan 1990).

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2.2.2 Groundwater

The lower part of the Ogallala Formation is saturated and forms a regional, unconfined aquifer that is used for domestic and irrigation water supply. The depth to groundwater is more than 250 feet near Cannon AFB, and the saturated thickness varies from 90 to 140 feet. The regional hydraulic gradient slopes to the southeast at about 13 feet per mile (0.0025 feet per foot). Well yields vary from less than 1 gallon per minute (gpm) in thinly bedded silts and fine sands to 1,600 gpm in sand and gravel.

Groundwater is the primary water source in eastern New Mexico. Water table declines of between 50 and 100 feet were observed in the area near Clovis, New Mexico for the period from approximately 1930 to 1980 (Lee Wan 1990).

2.3 SITE ST-26 HISTORY

The UST was active from 1941 to 1985. The tank and associated piping were removed in 1988. Historically, the site was a gas station from 1941 to 1965. From 1965 to 1985 the tank was used to store waste products. The tank reportedly received waste oils, spent solvents, paint thinners, and recovered fuels. The products were removed periodically from the tank. The quantities of each of the waste products stored in the tank are unknown.

2.4 AOC 36 HISTORY

Site AOC 36 is an area of potentially contaminated soil found near the current Morale, Welfare and Recreation (MWR) Outdoor Recreation Center in 1994. It was discovered when a contractor was preparing the area for a parking lot. This facility was originally the MWR auto hobby shop. When a new auto hobby shop was constructed, this building was converted into the Outdoor Recreation Center. The operations at the Outdoor Recreation Center probably would not have been responsible for this potential soil contamination. The potential contamination could be a remnant of the old Auto Hobby Shop or a disposal site for fluids from an aircraft engine maintenance shop in the early 1950s.

2.5 PREVIOUS SITE ST-26 INVESTIGATIONS

Site ST-26 has been the subject of several site investigations, which are summarized below:

- A Preliminary Review/Visual Site Inspection Report RCRA Facility Assessment (RFA) (A.T. Kearney 1987) identified three separate units within the area of Site ST-26: Underground Waste Oil Tank (48-A), Aboveground Overflow Capacity Tank (48-B), Inactive Petroleum, Oil and Lubricant (POL) Storage Tank No. 4028a and Inactive POL Storage Tank No. 4028b.
- During a Phase I RFI (LRL 1993), five soil borings shown on **Figure 2-3** (associated with both SWMUs 48A and 48B) were drilled and sampled to a depth of 30 feet bgs at the site of the former UST to determine whether a release of chemicals from the tank had occurred.

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Project Background and Corrective Measure Objectives

Collected samples were analyzed for Target Compound List (TCL) volatile organic compounds (VOCs); cyanide; Target Analyte List (TAL) metals; and benzene, toluene, ethylbenzene, and xylene (BTEX). Ethylbenzene, toluene, and xylene were detected in Boring No. 48A-2 at 10 and 20 feet bgs. The maximum concentration of xylene was 100 ppm at 20 feet bgs. Metals were detected above background concentrations in surface soil samples and subsurface soil samples collected from 20 feet bgs in all three borings.

- During a Phase II RFI (W-C 1995), five soil borings shown on **Figure 2-3** (4804, 4805, 4806, 4903, 4904) were drilled and sampled in the area surrounding the presumed location of the former UST. Two of the borings (4804 and 4805) were each drilled to a total depth of 39.5 feet bgs, while the third boring (4806) was drilled to at total depth of 40 feet bgs near the location of Phase I Boring No. 48A-2. The other two borings (4903 and 4904) were also drilled to total depths of 40 feet bgs. Boring 4903 was near the Phase I Boring No. 48B-2 and 4904 was located approximately 15 feet southeast of the former UST. The highest total recoverable petroleum hydrocarbon (TRPH) concentration in Boring 4904 was 594 mg/kg at 15 feet bgs; all compounds of concern were nondetect or below NMED screening levels. Metals were detected above background concentrations in surface and subsurface soils. The highest organic concentrations occurred in samples from Boring 4806. Total polynuclear aromatic hydrocarbons (PAH) concentrations reported in Boring 4806 ranged from 3.4 mg/kg to 18.99 mg/kg. Samples from Boring 4806 also had the following reported TRPH concentrations:
 - 729 mg/kg at 5 feet bgs
 - 17,300 mg/kg at 10 feet bgs
 - 3,890 mg/kg at 15 feet bgs
 - 2,080 mg/kg at 20 feet bgs
 - 1,350 mg/kg at 25 feet bgs
 - 199 mg/kg at 30 feet bgs
- A Corrective Measures Study (CMS) (URS 2000) was completed in 2000 that screened maximum detected concentrations of organic compounds and metals above background concentrations to what were the current U.S. Environmental protection Agency (EPA) Region 6 Residential media specific screening levels (MSSLs). Total petroleum hydrocarbons (TPH, as TRPH) were not evaluated since this is a complex chemical mixture with varying constituents; instead, individual constituents (e.g., BTEX, PAHs, etc.) were used to evaluate potential impacts from TPH at SWMU 48A. Because none of the individual chemicals detected at the site exceeded the screening values, the CMS recommended no further action for Site ST-26 (SWMU 48A).
- In 2004, NMED approved No Further Action for SWMU 48b, Aboveground Overflow Capacity Tank (NMED 2004).
- The RFI for 21 SWMUs (URS 2006) included SWMUs 49 and 50. SWMUs 49 and 50 were identified as inactive POL Storage Tanks. Samples from two borings (4903 and 4904)

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Project Background and Corrective Measure Objectives

completed near the location of the two inactive POL Storage Tanks were evaluated against current screening values. Low levels of organics, metals and TRPH were detected, but were below NMED screening levels and the RFI recommended No Further Action for SWMUs 49 and 50.

- The New Mexico Environmental Department (NMED) issued comments on the 2000 CMS in December 2006. These comments indicated that future work should consider the 2005 NMED TPH guidance, which lists a residential direct-exposure screening value for waste oil of 2,500 mg/kg. Based on these comments, Cannon AFB and AFCEE have contracted URS to excavate and dispose of impacted soils from Site ST-26 (SWMU 48A) to expedite regulatory closure.

2.6 PREVIOUS AOC 36 INVESTIGATION

At the time of the possible contamination discovery in 1994, a soil sample was collected and analyzed for VOCs, BTEX, and a full Toxicity Characteristic Leaching Procedure (TCLP) hazardous/toxic/disposal waste suite of analyses. All parameters, except barium by TCLP, were nondetect. The concentration of barium (1.7 mg/L) was below the regulatory threshold (100 mg/L). No other investigations are known to have been completed at AOC 36. Further site characterization, excavation and disposal activities are being undertaken in order to expedite regulatory closure of AOC 36.

2.7 CORRECTIVE MEASURES OBJECTIVES

The objectives of the corrective measures for Site ST-26 and AOC 36 are to ensure that each site does not pose unacceptable risks to human health or the environment and, once this has been verified, to obtain NFA approval for each site from NMED. To achieve these objectives, a phased approach was designed with re-assessment of existing data and additional field investigation being the first steps. The existing data re-assessment, a description of planned investigation activities and a description of the planned removal action are discussed in **Sections 2.7.1 through 2.7.3**, respectively. Finally, a site closure report will be prepared to document the results of the field investigation and removal actions, as described in **Section 2.7.4**.

2.7.1 Existing Data Re-Assessment

Analytical results from previous investigations at Site ST-26 (SWMU 48A) were reevaluated against current screening values. Data from ten soil borings drilled and sampled as part of previous studies in the vicinity of the former UST (CAN048-4804 through CAN048-4806, CAN049-4903 CAN 049-4904, SD48A-1 through SD48A-3, SD48B-1 and SD48B-2) were screened against the current generic NMED soil screening levels (SSLs) and background concentrations for metals. The results are summarized below.

Analytical results from the one soil sample at AOC 36 were also reevaluated.

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Site ST-26 Surface Soil Chemicals of Concern

Concentrations of aluminum, antimony, arsenic, barium, calcium, chromium, iron, lead, magnesium, mercury, nickel, and zinc were detected in surface soil samples collected from the ten soil borings. The maximum concentration for each of these compounds was greater than the respective background concentration established for Cannon AFB. Therefore, concentrations for the twelve metals are considered to be outside the naturally occurring range, but are not considered COCs since they are below NMEDs residential soil SSLs. In addition, a low level of toluene was detected in the surface sample for boring, CAN049-4903. The toluene concentration is below the NMED screening levels and is not considered a COC, as shown on **Table 2-2**.

Site ST-26 Subsurface Soil Chemicals of Concern

Elevated concentrations of TRPH, xylenes, 1,2-dichlorobenzene, 1,4-dichlorobenzene, 4-chloroaniline, 2-methylnaphthalene, naphthalene, barium, calcium, copper, lead and potassium were detected in subsurface soil samples collected at Site ST-26. However, as with the surface soil, the metals concentrations were above background concentrations, but below NMEDs residential soil SSLs and are not considered chemicals of concern. In addition, low levels of toluene, fluoranthene, and bis(20ethylhexyl)phthalate were detected in subsurface soil samples. The levels of these analytes are below NMED screening levels and are not considered COCs, as shown on **Table 2-2**.

Site ST-26 Extent of Elevated TPH Concentrations

Based on historical data, elevated TPH concentrations greater than NMED's TPH Screening Guideline of 2,500 mg/kg for waste oil (NMED 2006) have been detected in samples collected from the following two borings at depths ranging from 5 to 25 feet bgs: CAN048-4804 located in the northeast corner of the old UST location and CAN048-4806 located at the south end, between the former locations of the UST and the AST. TPH concentrations and COCs associated with previous sampling locations are shown on **Figure 2-6**; in addition, simplified boring logs for borings CAN048-4804, CAN048-4805, CAN048-4806, CAN049-4903 and CAN049-4904 showing sample locations and associated TPH concentrations are shown on **Figure 2-5**. The CMI Investigation sampling activities described in **Section 5** of this CMI Work Plan are designed to refine the horizontal and vertical extents of elevated TPH concentrations so that the excavation limits described in **Section 6** may be better defined.

Site ST-26 Re-Assessment Conclusion

The existing data indicate that the horizontal and vertical extents of contaminants could be refined in several areas. Therefore, the existing data were used to design the CMI Field Investigation activities described in **Section 5** of this Work Plan.

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Project Background and Corrective Measure Objectives

AOC 36 Re-Assessment Conclusion

The TCLP result for barium (1.7 mg/L) was below the regulatory threshold (100 mg/L). No chemicals of concern (COCs) were encountered at AOC 36. However, a single sample may not represent an adequate characterization of this area.

2.7.2 CMI Investigation

The CMI field investigation will be completed as the next phase of the Site ST-26 and AOC 36 CMI. This phase will include collecting samples for TPH and other chemical analyses and evaluating the results by comparing them to NMED's TPH Screening Guideline and the current NMED SSLs (NMED 2006b) (both generic and site-specific SSLs, as appropriate) to identify any additional COCs. The results of this investigation will be used in combination with previous results to further delineate the horizontal and vertical limits of contaminated media requiring removal.

2.7.3 CMI Removal Action

The corrective measures will be implemented as the third phase of the Site ST-26 and AOC 36 CMI. The corrective measures will include excavating TPH-contaminated soil above 2500 mg/kg to the limits delineated based on the CMI investigation results, transporting the excavated materials off site for disposal, and backfilling and restoring the site to its pre-existing surface.

2.7.4 Site Closure Report

A site closure report will be prepared to document all work completed for Site ST-26 and AOC 36. The site closure report will be prepared (i.e., CDRL A001d and A001e) and will include the following:

- An analytical data management report (CDRL A001c)
- Digital photographs (CDRL B010) and computer-aided design (CAD) drawings

TABLE 2-1
SUMMARY OF PETROLEUM HYDROCARBONS (as TRPH) DETECTED IN SOIL SAMPLES
PREVIOUSLY COLLECTED AT SITE ST-26 (SWMU 48A)
CANNON AFB

Sample ID COLLECT DATE	CAN048-4804-0005 12/11/1994			CAN048-4806-0005 12/12/1994			CAN048-4806-0010 12/12/1994			CAN048-4806-0015 12/12/1994			CAN048-4806-0020 12/12/1994			CAN048-4806-0025 12/12/1994			CAN049-4904-0015 12/12/1994		
	Result	RL	Qual	Result	RL	Qual	Result	RL	Qual	Result	RL	Qual	Result	RL	Qual	Result	RL	Qual	Result	RL	Qual
TRPH (mg/kg) Total Recoverable Petroleum Hydrocarbons	1,050	90.8	J	729	45		17,300	1320		3,890	907		2,080	137		1,350	492		594	44.9	

Note: Results presented here are only those TRPH results above Residential Direct Exposure level of 520 mg/kg

J = Estimated value.

Qual = Qualifier

RL = Reporting Limit.

TRPH = Total Recoverable Petroleum Hydrocarbons

TABLE 2-2
SITE 26 (SWMU 48A) MAXIMUM SOIL CONCENTRATIONS FROM PREVIOUS
SAMPLING LOCATIONS COMPARED TO NMED RESIDENTIAL SOIL SCREENING
LEVELS
CANNON AFB, NEW MEXICO

Chemical	Maximum Detected		Residential Soil SSL	
	Concentration (mg/kg)	Qual	Concentration ¹ (mg/kg)	Exceeds SSL?
VOLATILE ORGANICS				
2-Butanone	1.2	J	31800	NO
Acetone	0.41		28100	NO
Chlorobenzene	0.003	J	194	NO
Ethylbenzene	4.2		128	NO
Methylene Chloride	0.15		182	NO
Toluene	1.2		252	NO
Xylenes	32		82	NO
SEMIVOLATILE ORGANICS				
1,2-Dichlorobenzene	7.5		37.4	NO
1,3-Dichlorobenzene	0.7	J	32.6	NO
1,4-Dichlorobenzene	1.8		39.5	NO
2-Methylnaphthalene	12		N/A	
4-Chloroaniline	7.9		N/A	
Acenaphthene	0.088		3730	NO
Bis(2-ethylhexyl)phthalene	9.1		347	NO
Dibenzofuran	0.22		142	NO
Di-n-Butyl phthalate	0.41	J	6110	NO
Fluoranthene	1.2	J	2290	NO
Fluorene	0.19	J	2660	NO
N-Nitrosodiphenylamine	0.4	J	993	NO
Naphthalene	5.2		80	NO
Phenanthrene	0.4	J	1830	NO
Phenol	0.038	J	18300	NO
TRPH	17,300		N/A	
METALS				
Aluminum	16,300		77800	NO
Antimony	14		31	NO
Barium	2390		15600	NO
Chromium	13.8		234	NO
Copper	14.5		3130	NO
Iron	13,300		23500	NO
Lead	25.7		400	NO
Nickel	13.5		1560	NO

Note: (1) NMED Residential Soil Screening Levels (June 2006)

mg/kg = Milligram per kilogram

N/A = Not applicable

Qual = Qualifier

SSL = Soil screening level