





BILL RICHARDSON Governor

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# NEW MEXICO ENVIRONMENT DEPARTMENT

## Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1 Santa Fe, New Mexico 87505-6303 Phone (505) 476-6000 Fax (505) 476-6030

www.nmenv.state.nm.us



RON CURRY Secretary

JON GOLDSTEIN Deputy Secretary

## **CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

April 4, 2008

Colonel Timothy J. Leahy 27<sup>th</sup> Special Operations Wing 100 South D.L. Ingram Boulevard Cannon Air Force Base, New Mexico 88103-5214

**RE: APPROVAL WITH MODIFICATIONS** 

SITE ST-26 (SWMU 48A) AND AOC 36

CORRECTIVE MEASURES IMPLEMENTATION WORK PLAN,

CANNON AIR FORCE BASE, NEW MEXICO

EPA ID NO. NM7572124454

CAFB-07-003

## Dear Colonel Leahy:

The New Mexico Environment Department (NMED) has reviewed the Department of Air Force's (the Permittee's) *Site ST-26 (SWMU 48A) and AOC 36 Corrective Measures Implementation Work Plan* (Work Plan), dated August 2007. Based on the information presented in the Work Plan, NMED hereby approves the Work Plan with the modifications listed in this letter except for Appendix A (Health and Safety Plan) and Appendix B (Quality Assurance Project Plan). NMED neither reviews nor approves standardized QA/QC protocols or Health and Safety Plans.

### Comment 1:

The Site ST-26 underground storage tank (UST) reportedly received waste oils, spent solvents, paint thinners, and recovered fuels. Because the composition of some of these materials are unknown, the Permittee shall perform additional laboratory analysis on the soil samples to be collected from ST-26 in an attempt to better characterize the type of contamination. In addition to the analyses proposed in Section 5.3.1 (Subsurface Soil Sampling) of the Work Plan, the

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samples collected from Site ST-26 must be analyzed for target compound list (TCL) volatile organic compounds (VOCs), polychlorinated byphenyls (PCBs), and pesticides.

#### Comment 2:

Some of the analytical methods cited in Section 5.3.1 (Subsurface Soil Sampling, Analytical Methods) of the Work Plan have newer versions on the Environmental Protection Agency (EPA) website. The Permittee must use most updated EPA SW-846 methods for analyzing the samples.

### Comment 3:

In all the future work plans and reports the Permittee should not include either Health and Safety Plan or the Quality Assurance Project Plan, as NMED will neither review nor approve these documents. If desired, the Permittee may submit them as separate documents that will be kept in NMED's administrative record.

The Permittee must document all activities conducted pursuant to this approval. The Permittee must also include, in all subsequent reports, any deviations from approved work plans/reports. Noncompliance with the modifications outlined in the approval letter will potentially subject the Permittee to an enforcement action. As a reminder, the Permittee shall not respond to the comments provided in an Approval with Modifications unless NMED specifically requires a response and/or resubmittal (e.g., revised text and/or pages, additional information) in the approval letter.

Please contact Swarna Vonteddu at (505) 476-6057 should you have any questions.

Sincerely,

John E. Kieling

Program Manager

Permits Management Program

Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB

C. Frischkorn, NMED HWB

S. Vonteddu, NMED HWB

Gerald Pelfrey, CAFB

Ron Lancaster, CAFB

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HWB-CAFB-07-003