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DEPARTMENT OF THE AIR FORCE
27TH SPECIAL OPERATIONS CIVIL ENGINEER SQUADRON (AFSOC)
CANNON AIR FORCE BASE NEW MEXICO

Mr. Fernando L. Rodriguez
Chief, Natural Resources Management
506 N DL Ingram Blvd
Cannon AFB NM 88103-5003

FEB 23 2009

Mr. John E. Kieling
Hazardous Waste Bureau
New Mexico Environment Department-Hazardous Waste Bureau
2905 Rodeo Park Drive East-Building 1
Santa Fe NM 87505-6063

Dear Mr. Kieling

In response to paragraph 3, *Approval with Direction Final Site ST-26 (SWMU 48A) and AOC 36 Corrective Measures Implementation (CMI) Site Closure Report, February 6, 2009*, Cannon AFB provides the following response.

As stated, Section 3.3.4 of the *Site ST-26 (SWMU 48A) and AOC 36 CMI Site Closure Report*, soil cuttings and decontamination water were stored in 55-gallon steel drums with a secured lid until the analytical results were available. Then, in accordance with Section 5.6 of the approved *Site ST-26 (SWMU 48A) and AOC 36 CMI Work Plan*, the maximum analytical results for each detected chemical were screened against the Toxicity Characteristic Leaching Procedure regulatory limits, as applicable, using the "20 Times Rule." Based on the results of this screening (see attached Table 1), the soil cuttings were used as beneficial backfill during a grading project at Cannon AFB, and the decontamination water was discharged to the ground.

Cannon AFB appreciates our partners at the Hazardous Waste Bureau, and if you have any questions feel free to contact Mr. Jerry Pelfrey at (575) 784-6391.

Sincerely


FERNANDO L. RODRIGUEZ

Attachment:
Table 1

cc:
NMED (C. Frischkorn)
NMED (D. Cobrain)
EPA Region 6 (Bob Sturdivant)

**TABLE 1
COMPARISON OF SITE ST-26 (SWMU 48A) AND AOC 36 MAXIMUM CHEMICAL CONCENTRATIONS TO
SOIL SCREENING LEVELS AND 20 TIMES TCLP
CANNON AFB, NEW MEXICO**

Chemicals Detected at Site ST-26 (SWMU 48A)	Maximum Detected Concentration (mg/kg)	Qual	Chemicals Detected at AOC 36	Maximum Detected Concentration (mg/kg)	Qual	Residential Soil Screening Levels (mg/kg) ¹	Exceeds SSL?	20 Times TCLP Level ²
VOLATILE ORGANIC COMPOUNDS (mg/kg)			VOLATILE ORGANIC COMPOUNDS (mg/kg)					
Ethylbenzene	1.10E-03	F				1.28E+02	No	N/A
m,p-Xylene (sum of isomers)	5.20E-03	F	m,p-Xylene (sum of isomers)	6.00E-04	F	8.20E+01	No	N/A
			Methyl Acetate	3.60E-03	F	3.76E+04	No	N/A
			Tetrachloroethene	2.90E-03	F	1.25E+01	No	1.40E+01
						9.95E+01	No	N/A
o-Xylene (1,2-Dimethylbenzene)	1.80E-03	F						
SEMIVOLATILE ORGANIC COMPOUNDS (mg/kg)			SEMIVOLATILE ORGANIC COMPOUNDS (mg/kg)					
			Benzo(a)anthracene	7.80E-02	F	6.21E+00	No	N/A
			Benzo(a)pyrene	1.10E-01	F	6.21E-01	No	N/A
			Benzo(b)fluoranthene	1.70E-01	F	6.21E+00	No	N/A
			Benzo(g,h,i)perylene	1.10E-01	F	N/A	N/A	N/A
			Benzo(k)fluoranthene	8.00E-02	F	6.21E+01	No	N/A
			Chrysene	1.50E-01	F	6.15E+02	No	N/A
						6.11E+03	No	N/A
Di-n-butylphthalate	7.20E+00		Fluoranthene	2.50E-01	F	2.29E+03	No	N/A
Fluoranthene	9.70E-02	F	Indeno(1,2,3-cd)pyrene	8.30E-02	F	6.21E+00	No	N/A
			Phenanthrene	1.30E-01	F	1.83E+03	No	N/A
			Pyrene	2.60E-01	F	2.29E+03	No	N/A
Pyrene	1.00E-01	F						
PESTICIDES (ORGANOCHLORINE) (mg/kg)			PESTICIDES (ORGANOCHLORINE) (mg/kg)					
4,4-DDD	6.40E-02					2.44E+01	No	N/A
4,4-DDE	4.90E-01					1.72E+01	No	N/A
4,4-DDT	3.60E-02					1.72E+01	No	N/A
alpha-Chlordane	4.70E-02		alpha-Chlordane	4.70E-03		N/A	N/A	6.00E-01
gamma-Chlordane	4.90E-02		gamma-Chlordane	1.00E-03		N/A	N/A	6.00E-01
Heptachlor	6.10E-03					1.08E+00	No	1.60E-01
Methoxychlor	1.90E-03	F	Methoxychlor	6.00E-03	F	N/A	N/A	2.00E+02
POLYCHLORINATED BIPHENYLS (PCB) (mg/kg)			POLYCHLORINATED BIPHENYLS (PCB) (mg/kg)					
All Polychlorinated Biphenyls were nondetect			Aroclor 1260	5.30E-02	F	1.12E+00	No	N/A
TOTAL PETROLEUM HYDROCARBONS (mg/kg)			TOTAL PETROLEUM HYDROCARBONS (mg/kg)					
Diesel Range Organics	5.80E+02		Diesel Range Organics	1.00E+02		2.50E+03	No	N/A
Motor Oils	1.50E+03		Motor Oils	1.90E+02		2.50E+03	No	N/A
METALS (mg/kg)			METALS (mg/kg)					
Aluminum	1.31E+04		Aluminum	1.28E+04		7.78E+04	No	N/A
Antimony	2.50E-01	F	Antimony	3.70E-01	F	3.13E+01	No	N/A
Arsenic	3.60E+00	J	Arsenic	2.70E+00		3.90E+00	No	1.00E+02
Barium	1.44E+03		Barium	1.07E+03		1.56E+04	No	2.00E+03
Beryllium	4.80E-01		Beryllium	6.50E-01		1.56E+02	No	N/A
Calcium	2.71E+05		Calcium	1.91E+05		N/A	N/A	N/A
Chromium	1.12E+01		Chromium	9.90E+00		1.00E+05	No	1.00E+02
Cobalt	3.00E+00		Cobalt	2.70E+00		1.52E+03	No	N/A
Copper	6.40E+00		Copper	4.70E+00		3.13E+03	No	N/A
Iron	1.09E+04		Iron	1.02E+04		2.35E+04	No	N/A
Lead	2.12E+01		Lead	6.19E+01		4.00E+02	No	1.00E+02
Magnesium	1.33E+04		Magnesium	5.75E+03		N/A	N/A	N/A
Manganese	1.41E+02		Manganese	1.24E+02		3.59E+03	No	N/A
Mercury	4.60E-02	F	Mercury	1.80E-02	J	1.00E+05	No	4.00E+00
Nickel	8.80E+00		Nickel	8.00E+00		1.56E+03	No	N/A
Potassium	2.34E+03		Potassium	3.29E+03		N/A	N/A	N/A
Silver	1.50E-01	F				3.91E+02	No	1.00E+02
Sodium	2.98E+02		Sodium	2.44E+02		N/A	N/A	N/A
Thallium	6.50E-01	F				5.16E+00	No	N/A
Vanadium	1.96E+01		Vanadium	2.00E+01		7.82E+01	No	N/A
Zinc	1.77E+01	J	Zinc	2.90E+01		2.35E+04	No	N/A

Notes:

¹ NMED Soil Screening Levels Revision 4.0 (June 2006)

² The Toxicity Characteristic Leaching Procedure (TCLP) Regulatory Level provided in 40 CR 261.24 multiplied by 20 (mg/kg).

mg/kg = milligram per kilogram

N/A = Not Applicable

J = Estimated

Qual = Qualifier

F = Result between MDL and RL

SSL = Soil Screening Level

RL = Reporting Limit

**TABLE 1
COMPARISON OF SITE ST-26 (SWMU 48A) AND AOC 36 MAXIMUM CHEMICAL CONCENTRATIONS TO
SOIL SCREENING LEVELS AND 20 TIMES TCLP
CANNON AFB, NEW MEXICO**

Chemicals Detected at Site ST-26 (SWMU 48A)	Maximum Detected Concentration (mg/kg)	Exceeds 20 Time TCLP Level ?
VOLATILE ORGANIC COMPOUNDS (mg/kg)		
Ethylbenzene	1.10E-03	N/A
m,p-Xylene (sum of isomers)	5.20E-03	N/A
		N/A
		No
o-Xylene (1,2-Dimethylbenzene)	1.80E-03	N/A
SEMIVOLATILE ORGANIC COMPOUNDS (mg/kg)		
		N/A
		N/A
		N/A
		N/A
		N/A
Di-n-butylphthalate	7.20E+00	N/A
Fluoranthene	9.70E-02	N/A
		N/A
		N/A
Pyrene	1.00E-01	N/A
PESTICIDES (ORGANOCHLORINE) (mg/kg)		
4,4-DDD	6.40E-02	N/A
4,4-DDE	4.90E-01	N/A
4,4-DDT	3.60E-02	N/A
alpha-Chlordane	4.70E-02	No
gamma-Chlordane	4.90E-02	No
Heptachlor	6.10E-03	No
Methoxychlor	1.90E-03	No
POLYCHLORINATED BIPHENYLS (PCB) (mg/kg)		
All Polychlorinated Biphenyls were nondetect		N/A
TOTAL PETROLEUM HYDROCARBONS (mg/kg)		
Diesel Range Organics	5.80E+02	N/A
Motor Oils	1.50E+03	N/A
METALS (mg/kg)		
Aluminum	1.31E+04	N/A
Antimony	2.50E-01	N/A
Arsenic	3.60E+00	No
Barium	1.44E+03	No
Beryllium	4.80E-01	N/A
Calcium	2.71E+05	N/A
Chromium	1.12E+01	No
Cobalt	3.00E+00	N/A
Copper	6.40E+00	N/A
Iron	1.09E+04	N/A
Lead	2.12E+01	No
Magnesium	1.33E+04	N/A
Manganese	1.41E+02	N/A
Mercury	4.60E-02	No
Nickel	8.80E+00	N/A
Potassium	2.34E+03	N/A
Silver	1.50E-01	No
Sodium	2.98E+02	N/A
Thallium	6.50E-01	N/A
Vanadium	1.96E+01	N/A
Zinc	1.77E+01	N/A

Notes:

¹ NMED Soil Screening Levels Revision 4.0 (June 2006)

² The Toxicity Characteristic Leaching Procedure (TCLP) Reg.

mg/kg = milligram per kilogram

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