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NEW MEXICO  
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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 17, 2009

Ronald Lancaster  
Chief, Asset Management  
27 SOCES/CEA  
506 N. DL Ingram Blvd.  
Cannon AFB, New Mexico 88103-5003

**RE: NOTICE OF DISAPPROVAL FOR THE ADDENDUM TO THE SITE ST-26 (SWMU 48A) AND AOC 36 CORRECTIVE MEASURES IMPLEMENTATION WORK PLAN, CANNON AIR FORCE BASE, NEW MEXICO, EPA ID #NM7572124454 HWB-CAFB-08-007**

Dear Mr. Lancaster:

The New Mexico Environment Department (NMED) has received the Cannon Air Force Base's (Permittee) *Addendum to the Site ST-26 (SWMU 48A) and AOC 36 Corrective Measures Implementation Work Plan* (Work Plan Addendum), dated July 23, 2009. NMED has reviewed the Work Plan Addendum and hereby issues this Notice of Disapproval (NOD).

**Comment 1: Page 1, 4<sup>th</sup> paragraph**

The Permittee indicates that soil samples will be analyzed for diesel range organics (DRO), oil range organics (ORO), gasoline range organics (GRO) and the other constituents listed in

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Table 3, Petroleum-related Contaminants Screening Guidelines of NMED's TPH Guidance (October 2006). According to historical documents the tank and associated piping that was removed in 1988 was used to store waste products such as oils, spent solvents, paint thinners and recovered fuels. It is, therefore, unlikely that waste oil was the only contaminant. The Permittee must analyze soil samples for presence of volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), target analyte (TAL) metals and polychlorinated biphenyls (PCBs) in addition to DRO, ORO, GRO and other petroleum-related contaminants listed in Table 3 in NMED's TPH Screening Guidelines (October 2006).

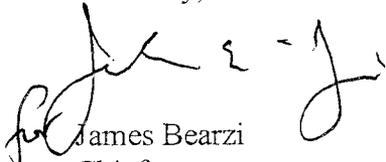
**Comment 2: Page 2, 1<sup>st</sup> paragraph**

The Permittee indicates that excavated soils with low-level contamination (i.e., less than 2,500 mg/kg TPH and below applicable NMED Soil Screening Levels) will be treated as overburden and used as backfill. If the excavated soil is determined to be hazardous waste based on analytical results, it must meet Land Disposal Restrictions treatment standards prior to land disposal. The excavated soil may be used as backfill only if the NMED determines that concentrations of any hazardous waste constituents are below contaminant-specific health-based levels. In addition, the Permittee should note that, since waste oil was not the only oil stored in the tank, Residential Direct Exposure Standards of 800 mg/kg (TPH) for unknown oil should be used instead of 2500 mg/kg in accordance with Table 2b of NMED's TPH Screening Guidelines (October 2006). The Permittee must properly dispose of contaminated excavated soil at a licensed disposal facility.

The Permittee must address each comment and submit a response to the NOD and a revised Work Plan Addendum by September 14, 2009.

Please contact Pat Stewart at (505) 476-6059, should you have any questions.

Sincerely,



James Bearzi  
Chief

Hazardous Waste Bureau

cc: J. Kieling, NMED HWB  
D. Cobrain, NMED HWB  
N. Dhawan, NMED HWB  
P. Stewart, NMED HWB  
File: CAFB 2009 and Reading  
HWB-CAFB-08-007