



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

ENTERED



Mr. Ronald A. Lancaster
Chief, Asset Management Flight
27 SOCES/CEA
506 N DL Ingram Blvd
Cannon AFB NM 88103-5003

SEP 09 2009

Ms. Patricia Stewart
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East – Building 1
Santa Fe NM 87505-6063

Dear Ms. Stewart

Cannon Air Force Base, NM is responding to a Notice of Disapproval (NOD) for the Addendum to the Site ST-26 (SWMU 48A) and AOC 36 Corrective Measures Implementation Work Plan, Cannon AFB, New Mexico, dated August 17, 2009 from the New Mexico Environment Department (NMED). Two (2) comments were presented in the NOD.

Cannon AFB agrees with Comment 1 with no exceptions and will analyze more soil samples for the contaminants defined in the attachment.

With regards to Comment 2, Cannon Air Force Base agrees that the Land Disposal Restrictions will be met prior to disposition, but takes exception to application of 800 mg/kg screening level for unknown oil over the 2500 mg/kg standard given the precedence set by AOC 36 CMI Site Closure Report (URS 2008b). A detailed explanation is presented in the attachment.

If you have any questions, please contact Mr. Hugh G. Hanson, Asset Management Flight, at 575- 784-6031 (temporary).

Sincerely,

Ronald A. Lancaster, YC-03

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

Air Commandos

ATTACHMENT

**RESPONSE TO COMMENTS
SITE ST-26 (SWMU 48A) AND AOC 36
CORRECTIVE MEASURES IMPLEMENTATION WORK PLAN
CANNON AFB, NEW MEXICO
EPA ID NO. NM7572124454
HWB-CAFB-08-007**

Comments by James Bearzi, Chief, Hazardous Waste Bureau, NMED dated August 17, 2009.

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, 4th 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 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 According to historical documents the tank and associated piping that was removed in 1988 was used to store waste products such as oils, spent solvents, paint thinners and recovered fuels.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).

Response: Agree. Soil samples will also be analyzed for VOCs, SVOCs, PCBs, and TAL metals in addition to TPH-GRO, TPH-DRO, and TPH-ORO.

Comment 2. 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.

Response: Agree. All excavated soils will meet Land Disposal Restrictions treatment standards prior to land disposal at a licensed facility. In addition, overburden will be properly screened and characterized before being used as backfill.

However, we disagree with NMED's note that the screening level for unknown oil (800 mg/kg) is more appropriate than the screening level for waste oil (2,500 mg/kg). The waste oil screening level was proposed in the original Site ST-26 (SWMU 48A) and AOC 36 CMI Work Plan (URS 2008a), which was approved with modifications (but without mention of the waste oil vs. unknown oil issue) by NMED on April 4, 2008. In addition, the waste oil screening level was used in the Site ST-26 (SWMU 48A) and AOC 36 CMI Site Closure Report (URS 2008b). This report was reviewed by NMED and comments were issued on February 6, 2009. These comments also do not mention the mention of the issue of waste oil vs. unknown oil for Site ST-26 (SWMU 48A), but they do state that "TPH results for AOC 36 were scree[ne]d against NMED's residential exposure for waste oil. For all future investigations [use the] residential value for 'unknown oil' for comparison."

According to Table 1 of the NMED TPH Screening Guidelines (NMED 2006), unknown oil is assumed to be composed of 100 percent shorter chain (C11-C22) aromatic hydrocarbons and waste oil is assumed to be composed of 100 percent longer chain (C19-C36) aliphatic hydrocarbons. Based on this, the 2008 CMI investigation analytical data demonstrates that the waste oil screening level is more appropriate for Site ST-26 (SWMU 48A) since TPH-GRO (C6-C12) was non-detect in all samples, and TPH-ORO (C22-C32) was detected at a maximum concentration (1,500 mg/kg) about three times higher than the maximum TPH-DRO (C12-C22) concentration (580 mg/kg). Further, the fact that the maximum VOC and SVOC concentrations associated with the 2008 samples all fell below the reporting limits and well below the most stringent screening levels provides additional evidence that the shorter chain (C11-C22) aromatic hydrocarbons associated with unknown oil are not present at Site ST-26 (SWMU 48A) in concentrations of any significance.