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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 14, 2009

Mr. Ronald A. Lancaster
27 SOCES/CEA
506 N DL Ingram Blvd
Cannon Air Force Base, New Mexico 88103-5003

**RE: REQUIREMENT FOR FURTHER CORRECTIVE ACTION,
CORRECTIVE ACTION COMPLETE PROPOSALS, JULY 2008
CANNON AIR FORCE BASE, EPA ID NO. NM7572124454
HWB-CAFB-08-004**

Dear Mr. Lancaster:

The New Mexico Environment Department (NMED) has completed its review of Cannon Air Force Base's (Permittee) *Corrective Action Completion Proposals*, dated July 2008. Based on the review, one Solid Waste Management Unit (SWMU 129) and one Area of Concern (AOC A) proposed by the Permittee are not appropriate for Corrective Action Complete (CAC) status.

AOC A, MOGAS Spill Site (SS-19)

AOC A is the site of two motor gasoline (MOGAS) spills that occurred in the early 1960s. The site is relatively flat and much of it is paved with asphalt. The portion not paved is a drainage swale extending to the southeast through a grassy area in the southern portion of the site. Construction of a gymnasium and associated pavement along Argentia Avenue changed the physical features of the spill area. Part of the drainage swale where the spills occurred is now located beneath pavement and a portion of the area exists as a small depression along the side of Argentia Avenue.

Ronald Lancaster
September 14, 2009
Page 2

The Permittee's proposal that AOC A is appropriate for CAC status is based on results of investigations conducted in 1985 and in 2005. Results of the investigations were reported in the Permittee's *Decision Document, MOGAS Spill AOC A/IRP No. SS-19, Cannon Air Force Base, HARZA Environmental Services, January 1997* and in *Supplemental Assessment of Areas of Concern A, B, & C, Cannon Air Force Base, URS Group, Inc. December 2005*. Results of both investigations indicate that lead and various volatile organic compounds (VOCs) were detected at concentrations below NMED soil screening levels (SSLs) for a residential land use scenario. However, no ecological risk screening was conducted by the Permittee.

Since the Permittee does not have eco risk screening values for the facility, NMED compared the maximum concentrations of detected lead and VOCs to the Los Alamos National Laboratory Ecorisk Database (Version 2.3, October 2008) and determined that lead detected in surface soil in 1985 exceeds the risk-based ecological screening level (range of 14 to 21 mg/kg). The surface soil sample where an elevated lead concentration was detected was collected in the drainage swale that runs alongside Argentia Avenue and is not covered by asphalt. The Permittee must conduct ecological risk screening for AOC A.

The lead contamination was a result of a surface spill, but only one surface soil sample (0-1.0 feet below ground surface) was collected in 1985 and no surface soil samples were collected in the 2005 investigation. The Permittee did not define the lateral extent of lead contamination for surface soil. It is not clear if lead-contaminated soil was removed and/or diluted by construction activities conducted subsequent to the 1985 investigation.

Further, analyses of soil samples collected in 2005 indicated that chloroform concentrations exceed the New Mexico generic Migration to Groundwater Dilution Attenuation Factor (DAF) of 20 SSL. Use of the SSL listed for a DAF of 20 for comparison is advised unless site-specific data on hydrologic conditions are available indicating that the DAF of 20 is not representative of site conditions. The Permittee must generate and compare a site-specific DAF for chloroform.

Until such time that (1) the surface soil in the drainage swale alongside Argentia Avenue is sampled and results indicate that lead is not present in concentrations exceeding the risk-based ecological screening level for lead or until the Permittee provides documentation indicating that lead-contaminated soil was removed or substantially disturbed during construction activities since 1985, and (2) comparison of chloroform concentrations to a site-specific DAF indicates that site conditions are protective of ground water, AOC A will not be considered for Corrective Action Complete status.

SWMU 129, Reported Oil/Water Separator and Associated Leach Field

Bulk waste oil was dumped into collection pits equipped with strainers at SWMU 129. From the pits, oil drained into the oil/water (O/W) separator which was then pumped through supply pipes into five above ground storage tanks. The water fraction, segregated by the O/W separator, exited through a port in the west side of the structure and flowed into a leach field located to the southeast of the facility. The leach field consisted of perforated plastic piping surrounded by crushed stone that allowed the water to be discharged into the subsurface and percolate into underlying soils.

The Permittee's proposal that SWMU 129 is appropriate for CAC status is based on results presented in its *Closeout Report / Contamination Assessment, SWMU 129 – Facility 244, Aboveground Tank Storage Area, Cannon Air Force Base, Clovis, New Mexico, July 19, 2000*. The NMED reviewed the cited report and could not determine if the leach field was sampled for presence of potential contaminants. The report described soil sample locations as: northeast corner of pad, southeast corner of pad, center of pad, northwest corner of pad, southwest corner of pad, north of O/W separator, south of O/W separator and east of O/W separator. The soil sample location nearest the leachfield appears to be Sample Number 2, Southeast Corner of Pad. Sample Number 2 was further described in Figure 4-2, Plan View of Facility 244 Showing Soil Sampling Locations, as "3 feet north of south fence, 4 feet, 3 inches west of east fence". Figure 4-2 indicates that it is not to scale. Figure 4-2 does not indicate the location of the referenced south fence or east fence nor does it indicate the position of the leach field.

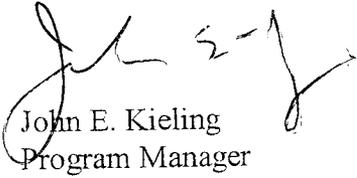
It is unclear whether or not the leach field was sampled. If the leach field was not sampled or was not adequately investigated, the NMED considers the investigation of SWMU 129 incomplete. Until such time that the Permittee provides documentation that the leach field was adequately sampled and the results of such sampling demonstrate that contaminants are not present at concentrations exceeding appropriate cleanup criteria, SWMU 129 will not be considered for Corrective Action Complete status.

NMED will proceed with preparation of a Statement of Basis and Public Notice to change the status of the other twelve sites proposed for Corrective Action Complete in the Permittee's July 2008 submittal.

Ronald Lancaster
September 14, 2009
Page 4

If you have any questions regarding the content of this letter, please call Pat Stewart at (505) 476-6059.

Sincerely,



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