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NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 28, 2009

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

**RE: REVIEW OF THE RESPONSE TO NOTICE OF DISAPPROVAL,
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) *Response to NMED's Notice of Disapproval, Addendum to the Site ST-26 (SWMU 48A) and AOC 36 Corrective Measures Implementation Work Plan (Work Plan Addendum)*, dated July 23, 2009.

In its response the Permittee disagreed that the use of the screening level for unknown oil (800 mg/kg) is more appropriate than the screening level for waste oil (2,500 mg/kg). The Permittee further stated that the waste oil screening level was proposed in the original *Site ST-26 (SWMU 48A) and AOC 36 Corrective Measures Investigation Work Plan, August 2007 (CMI Work Plan)*, which was approved with modifications.

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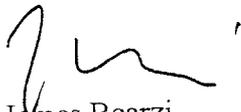
NMED considers the screening level for unknown oil appropriate for comparison of confirmatory samples because waste oil was not the only oil stored at SWMU 48A. Further, diesel range organics (with the assumed composition of 60% C11-C22 aromatics and 40% C9-C18 aliphatics) overlap with unknown oil (with the assumed composition of C11-C22 aromatics). NMED's *Approval With Direction, Final Site ST-26 (SWMU 48A) and AOC 36 Corrective Measures Implementation Site Closure Report*, dated February 6, 2009, stated in pertinent parts, "For all future investigations involving petroleum spills of unknown origin, the Permittee must use NMED's residential value for 'unknown oil' for comparison." This directive applies facility-wide.

Further, the original CMI Work Plan, approved with direction, did not propose backfilling soil cores with soil cuttings. The Permittee may not return contaminated environmental media to the point of origin because, by doing so, the Permittee will potentially create a landfill (subject to future remediation if regulations change) and alter the hydraulic characteristics of the subsurface soils which may provide a conduit for contaminant migration.

The Permittee must submit a revised Work Plan Addendum to NMED by November 1, 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
H. Hanson, CAFB
File: CAFB 2009 and Reading
HWB-CAFB-08-007