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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 30, 2009

Colonel Stephen Clark
27th Special Operations Wing
100 South D.L. Ingram Boulevard
Cannon Air Force Base, New Mexico 88103-5214

**RE: NOTICE OF DISAPPROVAL
ACCELERATED CORRECTIVE ACTION WORK PLAN FOR SWMU 31,
AEROSPACE GROUND EQUIPMENT (AGE) MAINTENANCE
FACILITY SHOP PAD, CANNON AIR FORCE BASE, NEW MEXICO,
JULY 2009
EPA ID #NM7572124454
HWB-CAFB-09-005**

Dear Col. Clark:

The New Mexico Environment Department (NMED) has received Cannon Air Force Base's (Permittee) *Accelerated Corrective Action Work Plan for SWMU 31, Aerospace Ground Equipment (AGE) Maintenance Facility Shop Pad* (Work Plan). NMED has reviewed the Work Plan and hereby issues this Notice of Disapproval (NOD) and provides the following comments.



Comment 1. Project Objectives, Section 1.1, Page 1-1:

The Permittee states that the Work Plan is “designed to achieve closure at SWMU 31 to minimize any threat to human health and the environment, without requiring maintenance,,,” The Permittee refers to “closure” in several places throughout the Work Plan. The NMED assumes that the Permittee intends to achieve the status of Corrective Action Complete Without Controls and remove SWMU 31 from Table 1, List of Solid Waste Management Units and Areas of Concern Requiring Corrective Action, of the permit through a Class 3 permit modification. Completion determinations are described in “*Final Guidance on Completion of Corrective Action Activities at RCRA Facilities*” [FRL-7454-7]. The Permittee should refer to Corrective Action Complete Status instead of “closure”.

Comment 2. SWMU 31 Site Description and History, Pages 2-1, 2-2.

Results of previous investigations are not clearly described. The only tabulated analytical data included in the Work Plan are from the most recent investigation, conducted in 2008, which included analyses of only gasoline range organics (GRO), diesel range organics (DRO) and motor oil. A Work Plan must be a complete document that does not require an extensive review of supporting documents to arrive at a conclusion. The Permittee must clearly summarize all previous investigations (*RCRA Facility Investigation, Appendix III SWMUs – Phase I, 1994, RCRA Facility Investigation, Appendix III SWMUs – Phase II, 1995 (RFIs), Voluntary Corrective Measure Implementation – SWMU 31, August 1999 and Final Letter Report, Voluntary Corrective Action AGE Maintenance Facility Shop Pad and POL Wash Pad (SWMU 127), July 2008*) and provide relevant figures and summary tables of analytical results.

Comment 3. Site Description and History, Section 2.2, 4th paragraph, Page 2-2:

The Permittee describes removal and disposal of four cubic yards of lead-contaminated soil that was excavated “adjacent to the entrance gate on the southern side of the AGE complex” in February 1999. The *Corrective Measures Study at SWMUs 31, 48A, 77 and 127* dated June 2000 describes removal of soil contaminated by benzo(a)pyrene, benzo(b)fluoranthene, lead and chromium from “the area of Soil Boring 3101”. It is unclear if the two described areas of excavation (“adjacent to the entrance gate” and “the area of Soil Boring 3101”) are the same. The Permittee must clarify and include a figure depicting the previously excavated area(s).

Comment 4. SWMU 31 Sample Location Map, Figure 2-3, following Page 2-2:

The 1994 Phase I RFI Soil Borings depicted in Figures 2-3 and 2-4 are mislabeled. They are tabulated below with correct labels. The Permittee must correct the soil boring labels in Figures 2-3 and 2-4.

Incorrect Label	Correct Label
0311	3101
0312	3102
0313	3103
0314	3104

Comment 5. Excavation/Removal Activities, Section 4.2.3, Pages 4-2 and 4-3.

The Permittee describes the proposed excavation limits and states that once excavation is deemed complete, confirmation samples will be collected from the bottom and sidewalls of the excavation for laboratory analysis. Further, the Permittee indicates that "clean soil removed from the site during excavation will be used as backfill". All backfill must be imported clean materials. The Permittee must revise the section to state that the excavation will be backfilled with clean imported fill.

Comment 6. Waste Characterization/Classification and Table 5-1. Waste Management Summary, Section 5.6.1, Pages 5-2 and 5-3.

On Page 5-2, the Permittee states that decontamination water, if generated, will be allowed to evaporate at the decontamination site. Evaporation of decontamination water could concentrate chemicals of potential concern (COPCs). The Permittee must analyze the decontamination water to determine the proper disposal pathway. The Permittee must describe sampling of decontamination water in the revised Work Plan. Waste sampling and disposal activities must be fully described in the summary report.

Comment 7. Field Sampling Plan, Section 6 and Design of Data Collection Operations, Section 6.3, Pages 6-1 and 6-2:

The Permittee proposes removing a concrete pad, then excavating the underlying soil to a depth of 2 to 4 feet below ground surface (bgs), then collecting sixteen confirmation samples from the sidewalls and floor of the excavation. The Permittee assumes that only petroleum contaminated soil remains at SWMU 31. However, in order to achieve the goal of Corrective Action Complete Without Controls, the Permittee must conduct more extensive analyses. Metals and volatile organic compounds (VOCs) have been detected during previous investigations and are COPCs for SWMU 31. The Permittee must collect samples from the floor of the excavation (0-0.5 feet) and at 4.5-5 feet below the excavation floor. All confirmatory soil samples must be analyzed for GRO, DRO, motor oil, VOCs, semi-volatile organic compounds (SVOCs), target analyte metals (TALs), and polychlorinated biphenyls (PCBs).

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Comment 8. Supporting Documents, Appendix B

The Permittee appended a copy of the *Draft Voluntary Corrective Action Letter Report AGE Maintenance Facility Shop Pad (SWMU 31) and POL Wash Pad (SWMU 127)* dated May 2008. When appending a previous report, the Permittee must provide the most recent version of the report. The Permittee must include a copy of the *Final Letter Report, Voluntary Corrective Action AGE Maintenance Facility Shop Pad (SWMU 31) and POL Wash Pad (SWMU 127)* dated July 2008, that was approved by the NMED, instead of the draft.

Comment 9. Project Schedule, Page 8-1.

According to the proposed project schedule in the plan, all activities may have been completed except for submittal of the final completion report. The permittee must obtain NMED approval of the Work Plan prior to its implementation. Unless the Permittee has conducted the work at risk, the Permittee must revise the project schedule.

The Permittee must address all comments and submit a revised work plan by November 1, 2009. All submittals must be in the form of two paper copies and one electronic copy. In addition, the Permittee must also provide an electronic red-line strike out version of the revised Work Plan that shows all revisions made to the plan.

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
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