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RON CURRY  
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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

March 29, 2010

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

**RE: NOTICE OF DISAPPROVAL  
REMEDY COMPLETION REPORT FOR SWMU 31 AGE  
MAINTENANCE FACILITY  
CANNON AIR FORCE BASE, NEW MEXICO, FEBRUARY 2010  
EPA ID #NM7572124454  
HWB-CAFB-09-005**

Dear Col. Clark:

The New Mexico Environment Department (NMED) received Cannon Air Force Base's (Permittee) *Remedy Completion Report for SWMU 31 AGE Maintenance Facility* dated February 2010 (Report) on March 1, 2010. NMED hereby issues this Notice of Disapproval and provides the following comments.

**Comment 1. Regulatory Framework, Page 1.1:**

The Permittee stated that its RCRA Permit was revised in 2005. The Permit was revised in 2003. The Permittee must correct this error.

**Comment 2. Site Classification, Page 2-6:**

The Permittee stated that SWMU 31 was considered to be a “Class 4 site” because there is no demonstrable threat to human health and safety or sensitive environmental receptors. The Permittee must define “Class 4” or remove the reference.

**Comment 3. Figure 2-1, Page 2-3:**

The delineation of SWMU 31 depicted in Figure 2-1 does not agree with the historical (1999) delineation of SWMU 31 depicted in the AGE Maintenance Shop Pad Site Plan found in Appendix A. The Permittee must revise Figure 2-1 to accurately depict the site’s boundaries.

**Comment 4. Conclusions and Recommendations, Page 4-1:**

The Permittee recommended a status of Corrective Action Complete without Controls for SWMU 31 based on previous investigations, risk evaluations, and the completion of the remedy. Tier 3 human health risk evaluations, reported in *Corrective Measures Study at SWMUs 31, 48a, 77 and 127 (June 2000)* and cited in the Report, were estimates of noncarcinogenic hazards and carcinogenic risks to occupational workers, hypothetical future construction workers, and hypothetical future trespassers. The risk assessment did not characterize potential risks associated with a residential use scenario.

Petroleum contaminated soil was removed during the 2009 voluntary corrective action conducted at SWMU 31. Organic contaminants exceeding New Mexico Soil Screening Levels for residential soil scenario (benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, dibenzo(a,h)anthracene, and indeno(1,2,3,pyrene) and metals in concentrations exceeding background (aluminum, arsenic, barium, cadmium, calcium, copper, iron, lead, magnesium, manganese, sodium and zinc) were detected in samples obtained from outside the limits of the remedial excavation. SWMU 31, therefore, is not eligible for Corrective Action Complete without Controls status. The Permittee must revise the recommendation or indicate that it will submit a work plan for remediating soils contaminated with organic compounds and metals to levels below evaluation criteria.

**Comment 5. Tables 4-1 and 4-2, Appendix A:**

The locator numbers for the soil sample analysis results shown in Tables 4-1 and 4-2 lack corresponding identifiers for the soil borings. For example, there is no indication that sample locator “CAN031-0313-0001” is a surface sample obtained from soil boring 3101. Because soil boring identifiers were referenced in the discussions and are depicted in Figure 2-1, the Permittee must indicate soil boring identifiers in Tables 4-1 and 4-2.

**Comment 4. Table 3-3. Confirmation Sample Results, Page 3:**

The Permittee stated that “no exceedances of the regulatory guideline were found in the new confirmation samples.” However, diesel range organic contamination was detected in one confirmatory sample (S14) at 250 mg/kg. This exceeds the Total Petroleum Hydrocarbon (TPH)

residential direct exposure for unknown oil (200 mg/kg). There are sufficient samples, however, to calculate a 95% upper confidence limit (UCL) of TPH concentrations. The U.S. EPA has issued guidance and ProUCL software (recently released version 4.0) specifically for estimating exposure point concentrations (EPCs), determining the attainment of cleanup standards, estimating background level mean contaminant concentrations, and comparing soil concentrations with site specific soil screening levels. The Permittee must revise the statement that no exceedances were found, and may choose to calculate a 95% UCL for TPH concentrations (excluding sample number S07 which was representative of soil that was removed in the second excavation event), and revise the conclusions as necessary based on achieving cleanup standards and comparing the mean TPH concentration with New Mexico Environment Department TPH Screening Guidelines for unknown oil residential direct exposure.

**Comment 5. Table 4-7, Comparison of SWMU 31 Maximum Soil Concentrations to MSSLs, Appendix A:**

Table 4-7 is incomplete. Metals missing from the table are antimony, beryllium, cadmium, manganese, selenium, and vanadium. The Permittee must complete the table.

The Permittee must address all comments and submit a revised report by May 24, 2010. Instead of submitting a complete report, the Permittee may submit only the revised report body and Appendix A as replacement pages. All submittals must be in the form of two paper copies and one electronic copy. The Permittee must also provide an electronic red-line strike out version of the revised Report that shows all revisions made to the Report.

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  
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