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Mr. David Cobrain
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Dr. E, Bldg 1
Santa Fe, NM 87505

RE: Draft Technical Evaluation of the *Final Letter Report, Revision 1 of the Voluntary Corrective Action AGE Maintenance Facility Shop (SWMU 31) and the POL Wash Pad (SWMU 127)*, Cannon Air Force Base, New Mexico, July 2008.

Dear Mr. Cobrain:

This letter serves as a deliverable and provides our draft technical evaluation of the *Final Letter Report, Revision 1 of the Voluntary Corrective Action AGE Maintenance Facility Shop (SWMU 31) and the POL Wash Pad (SWMU 127)*, Cannon Air Force Base, New Mexico, July 2008. As indicated in an email from Ms. Patricia Stewart (5/12/10), additional work is needed on Solid Waste Management Unit (SWMU) 31 and this review should only focus on the risk assessment and conclusions for SWMU 127.

The risk screening as provided in Table 3-3 incorporated soil screening levels (SSLs) from the June 2006 Soil Screening Guidance. As part of the review, the maximum detected site concentrations were compared to the December 2009 SSLs. While differences were noted in between the 2006 and 2009 SSLs, application of the 2009 SSLs would not have changed the overall conclusions that risk levels were calculated to be below both the carcinogenic and noncarcinogenic target levels.

There are a few concerns with the report that may warrant some additional consideration:

1. The nature and extent of potential contamination appears limited to within 15 feet below ground surface (ft bgs). This depth was identified as being the limit for reasonable human exposure. However, it is not clear whether the data are sufficient to indicate that the vertical extent of potential contamination has been identified. While deeper than 15 ft bgs may not pose a human health risk from direct exposure to soil, contamination in subsurface soil could pose as a threat to groundwater. It is not clear whether this issue has been addressed in other supporting documents not included with this letter report, however, it is recommended that the vertical extent of contamination be verified.

2. The risk screening did not include a comparison to soil-to-groundwater SSLs. As the letter report does not address site geology/hydrogeology, it is not clear whether groundwater is of concern at this site. However, it is recommended that the soil-to-groundwater pathway be addressed. (Note, based upon a cursory review of the maximum site data to SSLs based on a dilution attenuation factor of 20, none of the data exceed the screening levels.)
3. There was no discussion of ecological risks. In looking at the figures provided with the report, SWMU 127 appears to be a small area located within a heavily industrial site. The potential for ecological impact is most likely minimal due to the lack of sufficient habitat. While this issue may have been addressed and resolved in other documents, the letter report should summarize ecological risks (qualitatively or quantitatively).

If you or any of your staff have questions, please contact me at (801) 451-2864 or via email at paigewalton@msn.com.

Thank you,



Paige Walton
AQS Senior Scientist and Project Lead

cc: Patricia Stewart, NMED (electronic)
Joel Workman, AQS (electronic)