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May 28, 2010

DCN: NMED-2010-15

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



RE: Draft Technical Review of the Response to Notice of Deficiency Comments on the Corrective Action Complete Proposals, March 2010 for Solid Waste Management Units (SWMUs) 2, 4, 6, 10, 50, 72, 81, 82, 96, 98, 102, 106, and 125, Cannon Air Force Base, New Mexico

Dear Mr. Cobrain:

This letter serves as a deliverable and provides our draft technical evaluation of response to risk assessment related Notice of Deficiency (NOD) comments on the *Corrective Action Complete Proposals, March 2010 for Solid Waste Management Units (SWMUs) 2, 4, 6, 10, 50, 72, 81, 82, 96, 98, 102, 106, and 125, Cannon Air Force Base, New Mexico*. A revised report was not provided to evaluate the inclusion of responses.

The comments included in this review included Nos. 2, 3, 4, 5 and 6. Comment No. 7 includes some risk issues related to manganese; however, the facility has requested a discussion of the site history and use. It appears that additional sampling may be required to determine the full nature and extent of contamination. Unless otherwise addressed below, the responses to the NODs were adequate as provided.

Comment No. 2: The response indicates that shallow burrowing animals as well as a badger could be present in the vicinity of SWMU 102. The response also indicates that the area is mowed, which may inhibit long-term habitation of burrows and sustained populations of deeper burrowing animals. However, the overall concern is that there is a potential for burrowing animals to be exposed to soils below a depth of 0.6 feet. As such, additional risk screening evaluation is warranted. It is understood that the facility has requested a discussion of this issue. A formal assessment of the adequacy of this response will be delayed pending any additional information the facility provides during the conference call.

Comment No. 3: The soil-to-groundwater screening levels (SSLs) were calculated using toxicity data from 2006 instead of more current data reflected in the 2009 SSL tables. However, the response indicates that use of the 2009 data would not have changed the overall conclusions. Upon verification of this statement and calculations in the revised report, this response may be

deemed acceptable and additional revisions are not required. However, the facility should be aware that in the future, the most current toxicological data should be applied. Discussion of this comment on the scheduled conference call is not deemed necessary.

Comment No. 5: The response to this comment is unclear and does not seem to address the original concern. The original comments indicated that if site concentrations are greater than the SSL based upon a dilution attenuation factor (DAF) of 20, then a site-specific SSL based upon a site-specific DAF should be calculated. The comment does not state that a generic SSL can not be used. The facility may use generic SSLs as a first tier of analysis and is not required to always calculate a site-specific DAF.

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: Neelam Dhawan, NMED (electronic)  
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