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November 19, 2010

DCN: NMED-2010-36

Mr. David Cobrain
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Dr. East
Building One
Santa Fe, NM 87505

RE: Evaluation of the Responses to Notice of Disapproval for the Corrective Action Complete Proposals (SWMUs 2, 4, 6, 40, 50, 72, 75, 81, 82, 96, 98, 102, 105, and 125), Cannon Air Force Base, New Mexico, June 2010

Dear Mr. Cobrain:

This letter addresses the evaluation of the response to Notice of Disapproval (NOD) comments on the "Corrective Action Complete Proposals (SWMUs 2, 4, 6, 40, 50, 72, 75, 81, 82, 96, 98, 102, 105, and 125), Cannon Air Force Base, New Mexico", as revised October 2010. Each NOD comment is addressed below.

Comment No.1: The response to this comment is partially adequate. In reviewing the revised Johnson and Ettigner files, the following issues were noted:

1. Cancer risks for the vapor intrusion scenario are based on a 1E-06 target risk level. Thus, all cancer risk estimates for the vapor intrusion scenario are off by an order of magnitude. To complicate the matter, they did sum the inhalation risks with those risks from soil (screening levels), resulting in a total cancer risk value of mixed target risk. It is noted that because of this error, the inhalation risks are over-estimated by an order of magnitude. As the resulting risks are in excess of the target risk level of 1E-05 at several sites, it is recommended that appropriate corrections be made and the report and conclusions revised accordingly.
2. It appears that outside chemical-specific data, as opposed to default data, were applied in the Johnson and Ettinger inputs for the soil-water adsorption coefficient (Kd). Provide justification [e.g., source(s)] for these values.

Comment No. 2: The response to this comment is partially adequate. In reviewing the revised Johnson and Ettigner files, the following issues were noted:

1. The reference concentration (RfC) for toluene is incorrect in all of the spreadsheets. The current datum provided in the Integrated Risk Information System (IRIS) database is 5.0 mg/m³. Revise the spreadsheets and subsequent hazard estimates accordingly.
2. 2-methylnaphthalene and dieldrin are included in the vapor intrusion scenario. However, the inhalation toxicity data for these chemicals have been revoked. It is noted that inclusion of these chemicals using withdrawn data has no impact on the conclusions of risk. No modifications are needed.

Comment No. 3: The response to this comment was adequate. The risks derived from comparison to the soil screening levels were adjusted to a 1E-05 risk.

Comment No. 4: The response to this comment was adequate.

Comment No. 5: The response to this comment was not adequate. Hazard indices (HI) for the ecological receptors were not provided in either Table 6 or in Table 14. However, as part of this review, the HI was calculated for SWMU 81 (Table 6) and found to be below the target level of 1.0. The HI for SWMU 102 (Table 14) was significantly above the target level of 1.0. However, the refined ecological analyses for SWMU 102 (Table 15) resulted in HIs below the target levels.

Comment No. 6: The response to this comment was not adequate. HIs for the ecological receptors were not provided. However, as part of this review, the HIs were calculated for SWMU 102 (Table 15) and found to be below the target level of 1.0.

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 Program Manager

cc: Patricia Stewart, NMED (electronic)
Neelam Dhawan, NMED (electronic)
Joel Workman, AQS (electronic)
Sunny McBride, AQS (electronic)