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DAVE MARTIN
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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 26, 2011

Ronald A. Lancaster
Chief, Asset Management
506 N DL Ingram
Cannon Air Force Base, New Mexico 88103-5003

**RE: APPROVAL WITH MODIFICATIONS
PHASE II SUPPLEMENTAL ASSESSMENT AT AREA OF CONCERN A (SS-19)
PROJECT ACTIVITIES WORK PLAN ADDENDUM
CANNON AIR FORCE BASE, NEW MEXICO
CURRY COUNTY, NEW MEXICO
EPA ID #NM7572124454
HWB-CAFB-11-002**

Dear Mr. Lancaster:

The New Mexico Environment Department (NMED) has received the Cannon Air Force Base (CAFB, Permittee) *Phase II Supplemental Assessment at Area Of Concern A (SS-19) Project Activities Work Plan Addendum Cannon Air Force Base, New Mexico*, (Addendum) dated May 2011 and received May 18, 2011. NMED has completed its review of the Addendum and hereby issues this Approval with Modifications.

Modifications:

1. Section 1.5, Data Quality Objectives, second paragraph, last sentence, page 1-4:

Permittee's Statement: "A maximum chemical concentration that exceeds an [soil screening levels] SSL does not mean that a health risk exists because the maximum concentration detected is not the concentration to which people would routinely be exposed, and the exposure assumptions used to derive the SSLs are not site-specific."

NMED Comment: While the Permittee's statement is true, it should be pointed out that the Permittee does not necessarily have to use maximum contaminant concentrations to evaluate human health and ecological risks. If five or more samples are collected for analysis of a contaminant, it may be possible to calculate an upper confidence level (UCL) of the arithmetic mean concentration for a constituent and the UCL may be used as the exposure point concentration (EPC) for that constituent. If an appropriate UCL cannot be calculated or if the calculated UCL exceeds the maximum detected concentration (or the maximum constituent detection limit), the maximum detected concentration must be used. The United States Environmental Protection Agency (EPA) has developed a program (ProUCL 4.00.05) to calculate the 95 percent (%), 97.5%, and 99% UCL and to recommend a distribution and UCL based on the distribution of a given data set. The ProUCL program is based on EPA guidance. This information is provided for the Permittee's future use.

2. Section 1.5, Data Quality Objectives, third paragraph, page 1-4:

Permittee's Statement: "NMED SSLs for soil exposures are based on the ingestion, inhalation, and dermal exposure routes. SSLs are available for industrial and residential scenarios. [Area of Concern] AOC A is located in industrialized areas of the base; therefore, the industrial SSLs for lead (8.00E+02 [milligrams per kilogram] mg/kg) will be used for screening at this site."

NMED Comment: NMED agrees that AOC A is in an industrial area of the base. In order to be considered for a Corrective Action Complete without controls determination, all AOC A constituents must be present at concentrations less than the corresponding residential SSL. Screening must evaluate lead results for both scenarios in the future Investigation Report for the Phase II Supplemental Assessment at Area of Concern A (SS-19)

3. Section 5.3, Phase II Supplemental Assessment at AOC A (SS-19) Report, page 5-1, first bulleted item:

NMED Comment: Do not include copies of digging permits in NMED's copy(s) of the report.

4. Appendix A, Table 12-2, Calibration and [quality control] QC Procedures for [United States Environmental Protection Agency] USEPA Method SW 6010B Phase II Supplemental Assessment at AOC A (SS-19), page 12-4:

NMED Comments: For the Permittee's information, the current version of the Inductively Coupled Plasma-Atomic Emission Spectrometry analytical method is 6010C.

The spacing of the table row for initial calibration (page 12-4) is insufficient to display all of the information associated with the QC Check column. Provide a revised page 12-4 that displays all of the QC Check information by no later than September 30, 2011. In the event wider row spacing results in pagination changes to other pages of the table, provide a revised Table 12-2 that includes the information contained on current pages 12-3 through 12-7.

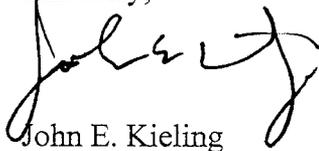
5. SOP No. 1, Section 1.2.4.2, Duplicate Samples, page 1-4:

NMED Comment: Since lead will be the only element analyzed, the Permittee must thoroughly mix the sample aliquot(s) slated for duplicate sampling. Homogenize the aliquot in a clean stainless-steel bowl.

According to Figure 1-5 of the Addendum (*Project Schedule, Phase II Supplemental Assessment at AOC A (SS-19), Cannon Air Force Base, New Mexico*), the Permittee will submit the associated Investigation Report (IR) to NMED by or before **December 1, 2011**. NMED concurs with the proposed submittal date.

If you have any questions regarding this approval, please contact Daniel Comeau at (505) 476-6043.

Sincerely,



John E. Kieling
Acting Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
N. Dhawan, NMED HWB
R. Lancaster, CAFB
A. Lafuente, CAFB
K. Walker, CAFB
L. King, EPA Region 6

File: 2011 - CAFB Phase II IWP_NoA_w/_Mods, AOC A