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NEW MEXICO ENTERED  
ENVIRONMENT DEPARTMENT

*Hazardous Waste Bureau*

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DAVE MARTIN  
Cabinet Secretary

BUTCH TONGATE  
Deputy Secretary

JAMES H. DAVIS, Ph.D.  
Director  
Resource Protection Division

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

November 16, 2012

Colonel David C. Piech, Commander  
27th Special Operations Mission Support Group  
110 E. Sextant Avenue, Building 600, Suite 1098  
Cannon Air Force Base, New Mexico 88103

**RE: APPROVAL  
FINAL WORK PLAN – RESOURCE CONSERVATION AND RECOVERY ACT  
FACILITY ASSESSMENT - SOLID WASTE MANAGEMENT UNIT 73,  
CANNON AIR FORCE BASE, NEW MEXICO  
CURRY COUNTY, NEW MEXICO  
EPA ID #NM7572124454  
HWB-CAFB-12-002**

Dear Col. Piech:

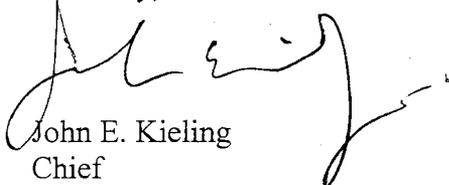
The New Mexico Environment Department (NMED) has received the Cannon Air Force Base (Permittee) *Final Work Plan – Resource Conservation and Recovery Act Facility Assessment - Solid Waste Management Unit 73, Cannon Air Force Base, New Mexico* (IWP), dated April 2012 and received August 1, 2012. NMED has completed review of the document, approves the IWP and provides the following comments.

- It is NMED's opinion that implementation of the IWP may produce inconclusive results with respect to characterization of the potential nature and extent of site contamination, if any. This opinion is based on the lack of proposed sampling of sediments currently covered by ponded stormwater and by the IWP requirement that boring placement must occur a minimum of 10 feet from standing water (IWP, Section 8.1, pages 8-1 and 8-2, *Drilling Operations*, third and fifth paragraphs).
- As provided in IWP Section 8.3.3, (*Encore Sample Collection*, page 8-8), under no circumstances may soil samples intended for volatile organic compound (VOC), Total Petroleum Hydrocarbons, Gasoline Range Organic (TPH/GRO) or TPH Diesel Range Organic analysis be homogenized by any means prior to placement into sample containers (IWP, Section 8.3.1, *Surface Soil/Sediment Sample Collection*, page 8-6, fourth bulleted item and Section 8.3.2, *Subsurface Soil Sample Collection*, page 8-8, fifth bulleted item).

The final RCRA Facility Assessment Report is due by or before **April 15, 2013**.

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

Sincerely,



John E. Kieling  
Chief  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
N. Dhawan, NMED HWB  
D. Comeau, NMED HWB  
L. King, EPA 6PD-N  
R. Lancaster, CAFB  
M. Higginbotham, CAFB

File: CAFB 2012; NoA; SWMU 73, Stormwater Drainage and Retention Pond RFA