



SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.nmenv.state.nm.us



DAVE MARTIN
Cabinet Secretary

BUTCH TONGATE
Deputy Secretary

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

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 30, 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 WITH MODIFICATIONS
REVISED SITE INVESTIGATION AT EIGHT SITES
PROJECT ACTIVITIES WORK PLAN
CANNON AIR FORCE BASE, NEW MEXICO
CURRY COUNTY, NEW MEXICO
EPA ID #NM7572124454
HWB-CAFB-11-005**

Dear Col. Piech:

The New Mexico Environment Department (NMED) has received the Cannon Air Force Base (Permittee) *Site Investigation at Eight Sites Project Activities Work Plan (IWP)*, dated April 2012 and received April 18, 2012. NMED has completed review of the IWP and approves the IWP with the following modifications.

Modifications:

1. Section 4.4.1, Site Description and Background (ST-C504), second paragraph, page 4-6:

Permittees' Statement: "A UST (1400B) was removed from an area to the northeast of ST-C504 on November 17, 1994. No signs of leakage were recorded during tank removal; therefore, UST 1400B does not present a potential source of contamination to ST-C504."

NMED Comment: As written, this statement is misleading since subsequent paragraphs in the same section indicate that chemical analyses of various subsurface soil samples associated with the underground storage tank (UST) indicated evidence that a release had occurred from the UST. The Permittee must either remove the paragraph from the IWP or revise it to reflect actual site conditions.

Provide a substitute page containing appropriately revised language.

2. Section 4.8.1, Site Description and Background (TA/AS-C129), fourth paragraph, last sentence, page 4-17:

Permittees' Statement: "The leach field consisted of perforated plastic piping surrounded by crushed stone that allowed the water to be discharged into the subsurface and percolate into underlying soils without impacting the groundwater (Parallax 2000)."

NMED Comment: According to the referenced report, all soil samples collected by Parallax in December 1999 were surface samples collected from beneath the removed concrete containment pad. No evidence (positive or negative) was collected to determine potential groundwater impacts associated with the site.

Revise the statement to remove the speculative information and provide a replacement page to reflect site conditions.

3. Section 5.2.3, Surface Soil Analytical Sample Collection, fourth paragraph, page 5-5:

Permittees' Statement: "Surface soil samples submitted to EMAX will be analyzed for analytical parameters on a 21-day turnaround time."

NMED Comment: Several of the analyte groups listed in this section have extraction or analytical (or both) holding times that are less than 21 days. Review the analytical methods to ensure that all samples (including quality assurance/quality control samples) are analyzed within recommended holding times and revise the sentence accordingly. The same comment applies to the last sentence of the third paragraph of Section 5.3.3 (*Subsurface Soil Analytical Sample Collection*).

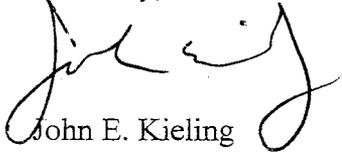
Provide replacement pages that reflect current recommended sample extraction/analysis holding times.

Col. David Piech
November 30, 2012
Page 3

Given the likely responses to these modifications, the Permittee may consider submittal of an errata sheet which addresses these modifications in lieu of providing replacement pages to address the modifications. The Permittee must submit the revised pages or errata sheet as discussed above by **December 28, 2012**. The Permittee must submit the Investigation Report (IR) for the eight sites by **July 21, 2014**.

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; IWP – Eight Sites