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Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

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DAVE MARTIN
Cabinet Secretary

BUTCH TONGATE
Deputy Secretary

TOM BLAINE, P.E.
Director
Environmental Health Division

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 13, 2013

Colonel Heather L Buono, Commander
27 SOMSG/CC
27th Special Operations Mission Support Group
110 E. Alison Avenue, Suite 1098
Cannon Air Force Base, New Mexico 88103

**RE: APPROVAL
FINAL SOURCE REMEDIATION REPORT
FIRE TRAINING AREA NO. 8 (SOLID WASTE MANAGEMENT UNIT 107)
CANNON AIR FORCE BASE (CAFB)
CURRY COUNTY, NEW MEXICO
EPA ID #NM7572124454
HWB-CAFB-13-003**

Dear Colonel Buono:

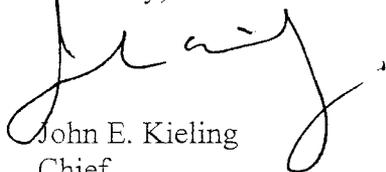
The New Mexico Environment Department (NMED) has received Cannon Air Force Base's (CAFB's) *Final Source Remediation Report Fire Training Area No. 8 (Solid Waste Management Unit 107)* (Remedy Completion Report), dated April 2013 and received May 31, 2013. NMED has completed its review of the document, approves the Remedy Completion Report for Solid Waste Management Unit (SWMU) 107 and provides the following comments.

Comments:

1. NMED does not have a "Standard Operating Procedures for Field Methods and Sampling" (see report, page 7, second paragraph) and any future work plans and reports prepared by or on behalf of CAFB must not contain that reference.
2. Although not mentioned in the Remedy Completion Report, NMED noted that 16 of 44 of the soil samples collected August 7-10, 2012 during the Remedial Investigation phase of the project were analyzed by the laboratory (Spectrum Analytical Inc., Tampa, FL) one to two days past recommended holding times for the samples. This appears to be the result of the laboratory since the samples were received by the laboratory on August 11, 2012 (pages 389-394, Appendix B, Spectrum Analytical Laboratory Data – Remedial Investigation) according to Chain of Custody forms included in the report. While NMED does not condone this type of violation, resampling cannot be conducted since the affected soils were excavated and disposed in January 2013. According to Appendix C (Spectrum Analytical Laboratory Data – Closure Soil Samples) of the Remedy Completion Report, samples collected for the post-excavation confirmation soil samples were analyzed within recommended holding times.
3. NMED also noted that "decontaminated" hollow-stem augers were placed directly on the ground near the decontamination station (photo #12, Appendix D, Photographs – Remedial Investigation and Source Remediation Activities). This is not an acceptable practice for management of decontaminated field equipment. CAFB must prohibit this practice by its future contractors.

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: N. Dhawan, NMED HWB
D. Cobrain, NMED HWB
D. Comeau, NMED HWB
S. Kottkamp, CAFB
R. Lancaster, CAFB
M. Gaballa, CAFB

File: CAFB 2013 Approval - Final Source Remediation Report Fire Training Area No. 8 (Solid Waste Management Unit 107)