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NMED  
Hazardous Waste Bureau

October 22, 2014

DCN: NMED-2014-017

Mr. David Cobrain  
NMED - Hazardous Waste Bureau  
2905 Rodeo Park Dr. East  
Building One  
Santa Fe, NM 87505

RE: Evaluation of the Responses to Comments on the "Site Investigation at Eight Sites", Cannon Air Force Base, New Mexico.

Dear Mr. Cobrain:

This letter addresses the review of the responses to comments and the incorporation of those responses into the "RCRA Facility Assessment, Site Investigation at Eight Sites", Cannon Air Force Base, New Mexico, dated September 2014.

New Comment: Many of the responses to comments were adequate as provided although they included specific references to adherence to the 2012 NMED Soil Screening Guidance (SSG). The facility should be aware that a new revision to the SSG will be released in November 2014 and that future evaluations must be in accordance with guidance in the most recent SSG and outdated versions (e.g., 2012) should not be used.

Unless discussed below, all the responses were adequate as presented.

General Comment No. 3. The lines of evidence for exclusion of the soil-to-groundwater pathway are adequate. The presence of clay and a caliche layer along with the arid conditions likely prevent significant downward migration. As part of this review, the data for sites ST-C502 and ST-C-503 were reviewed, as no additional investigations are recommended for these two sites. The maximum detected concentrations reported for both of these sites are below the NMED soil screening levels based on a dilution attenuation factor of 20. No additional comments or actions are needed to resolve this issue.

General Comment No. 4. The response to this comment was adequate and cumulative risks for the two sites recommended for no additional investigation (ST-C502 and ST-C-503) were provided in Tables 5-2a and 5-3a. However, the title for Table 5-3a should refer to site ST-C503 instead of ST-C502.

*The contents of this deliverable should not be evaluated as a final work product.*

Comment No. 5. The lines of evidence are acceptable as provided. The lines of evidence are also consistent with the 2014 NMED Soil Screening Guidance. No additional comments or actions are needed to resolve this issue.

General Comment No. 8. The response to this comment is adequate; however, the reference to the Los Alamos National Laboratory Ecological Screening Levels should reflect the most current ecological toxicity data included in the ECORISK database. The most current (today) is dated 2012.

Specific Comment No. 5. The response to this comment is adequate. However, please note that the 2014 revision to the NMED SSG includes specific equations for calculating the ecological screening assessments. This most recent NMED SSG should be used for future evaluations.

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: Dan Comeau, NMED (electronic)  
Joel Workman, AQS (electronic)