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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 19, 2016

Colonel Douglas W. Gilpin
Commander, 27th Special Operations
Mission Support Group
110 E. Alison Avenue, Suite 1098
Cannon Air Force Base, New Mexico

**RE: APPROVAL WITH MODIFICATIONS
FINAL WORK PLAN RCRA FACILITY
ASSESSMENT AT OW541&OW560
CANNON AIR FORCE BASE, NEW MEXICO
EPA ID #NM7572124454
HWB-CAFB-15-008**

Dear Colonel Gilpin:

The New Mexico Environment Department (NMED) has received Cannon Air Force Base's (Permittee) *Final Work Plan RCRA Facility Assessment at OW541 & OW560* (Work Plan), dated December 18, 2015 and received December 23, 2015. NMED has reviewed the Work Plan and hereby approves the document with the following modifications.

Modifications:

1. Section 4.1, Sampling Strategy and Rationale

Permittee's Comment: Surface samples will be collected from 0.0 to 0.5 [feet] ft [below ground surface] bgs. Seven subsurface samples will be collected at 5 [foot] ft increments (5ft, 10ft, 15ft, 20ft, 25ft, 30ft, and 35ft) down to 35 feet bgs.

NMED Comment: The collection of surface soil samples does not appear to be necessary along the drain line at OW560 between sand traps ST368A and ST368B. Unless further review of relevant site information suggests otherwise, adjust the sampling plan for OW560 so that samples are collected below the identified drain line at sample locations BH-2, BH-3, BH-4 and BH-5. A soil sample at sample location BH-1 must be collected at the base of the former sand trap location. Sampling depths must be based on available site plans, as built drawings, and historical information. Submit replacement pages to correct the Work Plan text and Table 4-1, "Sampling Locations and Methods Requirements OW541& Bldg. 368" to reflect the changes to the sampling plan. The remaining proposed sample collection intervals appear adequate to delineate the vertical extent of any identified impacts at OW560.

2. Section 4.1.1, OW541

Permittee's Comment: The first proposed borehole (BH) location (BH-1) will be directly adjacent to OW541 (approximately 2 [feet] (ft) south) to evaluate the level of contamination nearest the oil water separator from potential spillover and/or valve leaks. BH-2 and BH-3 will be on the west and east side of OW541, respectively, to assess the level of contamination on both sides of the [oil water separator] OWS.

NMED Comment: Borings BH-2 and BH-3 must also be located within two feet of the oil water separator. All sampling at the OWS must not to exceed a radius of five feet. All other proposed sampling locations appear adequate to delineate any impacts at the site.

3. Section 4.2.3, Generation of Soil Classification Logs

Permittee's Comment: Soil descriptions and classification will conform to [Unified Soils Classification System] (USCS) (American Society for Testing and Materials [ASTM] International, 2006), in accordance with Section 5.2.2.c of the Permit (NMED, 2003).

NMED Comment: It is unclear which section of the Permit the Permittee is referring to; Facility Permit Attachment 3, RCRA Facility Investigation (RFI) Scope of Work, outlines the requirements for investigations conducted at the facility. Section 3.2.2.a.ii, Soils, outlines the permit requirements for soil utilizing the referenced ASTM standard for an RFI.

4. Section 4.3, Sampling and Analysis

Permittee's Comment: Soil samples collected during sampling activities will be submitted for chemical analysis of [volatile organic compounds] (VOCs), [total petroleum hydrocarbons] (TPH) ([oil range organics] (ORO) and [diesel range organics] (DRO), [semi-volatile organic compounds] (SVOCs), [target analyte list] (TAL) metals and pesticides. Table 4-1 presents the laboratory methods, sample quantities, and sample types for soil sampling at OW541 and OW560.

NMED Comment: Text in Section 4.3 does not agree with Table 4-1, Sampling Locations and Methods/SOP Requirements OW541& Bldg. 368, which outlines the proposed sampling for TPH for gasoline range organics (GRO) and DRO. Section 4.3 indicates TPH sampling will be conducted for DRO and ORO. Additionally, Section 2.4.2 Exposure Pathways identifies TPH DRO and ORO as constituents of potential concern (COPCs). Correct the Work Plan text and Table 4-1 to resolve the discrepancy and to reflect the correct sample analyses, and provided replacement pages with the corrections.

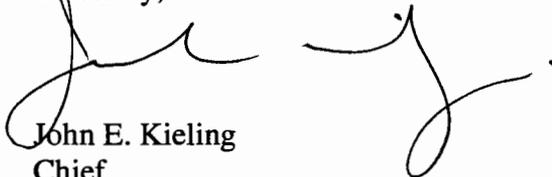
5. Table 4-3, Reference Limits and Evaluation Table

NMED Comment: The screening level reference for cobalt appears to be mislabeled as an NMED soil screening level (SSL). The listed screening levels appear to be the Environmental Protection Agency (EPA) regional screening level (RSL) for cobalt. Current July 2015 NMED Risk Assessment Guidance does not list an SSL for cobalt. Various errors were identified for the referenced NMED SSLs (e.g., isopropylbenzene, 1,2,4,5-tetrachlorobenzene, 1,2-diphenylhydrazine, anthracene, and fluoranthene) which appear to be attributed to calculation errors associated with conversion of the screening levels from milligrams per kilogram to micrograms per kilogram. The referenced SSLs and dilution attenuation factor (DAF) for gamma-BHC (Lindane) are incorrect. Additionally, the laboratory detection limit appears to be above the NMED residential SSL for N-nitrosodimethylamine and benzidine. The Permittee must ensure that current and accurate screening levels are listed in the report and ensure that all analytical method detection limits are below SSLs.

Submit replacement pages for the Work Plan which address NMED's comments no later than **May 20, 2016**.

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

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

Colonel Gilpin
April 19, 2016
Page 4

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