




CB&I Federal Services LLC
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June 27, 2016

John E. Kieling
Bureau Chief, Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6313



SUBJECT: Public Notice, Interested Persons Letters, and Public Meeting for a Class 3 Permit Modification Request, Solid Waste Management Unit 127

Dear Mr. Kieling:

A Corrective Action Complete (CAC) Proposal was submitted for Solid Waste Management Unit (SWMU) 127 requesting a Class 3 Permit Modification to change the status of SWMU 127 from Corrective Action Required to CAC with Controls. In compliance with Title 40 of the Code of Federal Regulations Part 270.42(c), the public was notified of the permit modification request. This letter documents how and when the public notification requirements were fulfilled.

Legal notices were published in the *Clovis News Journal* and the *Portales News-Tribune* on 05 June 2016 and 07 June 2016. The public notices provided information regarding the Class 3 Permit Modification Request documented in the CAC Proposal. Attachment 1 contains the affidavits of publication.

A 60-day public comment period began on 05 June 2016 and will continue until 04 August 2016. The facility mailing list was requested and interested persons on that list were sent letters containing copies of the public notice. Attachment 2 contains copies of the facility mailing list, letter, and notice.

A public meeting was held on 20 June 2016 at the Clovis-Carver Public Library in Clovis, New Mexico. No members of the public attended the meeting. Attachment 3 contains copies of the list of attendees and the presentation.

If you have any questions regarding these documents, please contact Dezbah Tso-Jesus at (505) 262-8718 or at dezbah.jesus@cbifederalservices.com.

Sincerely,

Dezbah Tso-Jesus

Cc: Dave Cobrain, NMED HWB (letter only)
Gabriel Acevedo, NMED HWB (with enclosures)
Brian Renaghan, AFCEC (letter only)
Sheen Kottkamp, CAFB (with enclosures)
Project File (with enclosures)

ATTACHMENT 1

AFFIDAVIT OF LEGAL PUBLICATION

LEGAL # 45647

STATE OF NEW MEXICO
COUNTY OF CURRY:

The undersigned, being duly sworn, says:
That she is a Legal Clerk of
The CLOVIS NEWS JOURNAL, a daily
Newspaper of general circulation,
published in English at Clovis,
said county and state, and that the
hereto attached

PUBLIC NOTICE
LEGAL 45647 JUNE 5, 2016

was published in said CLOVIS NEWS JOURNAL,
a daily newspaper duly
qualified for that purpose within
the meaning of Chapter 167 of the
1937 Session Laws of the State of
New Mexico for 2 consecutive
days/weeks on the same days as follows:

06/05/2016 06/07/2016

Tammy Jewby

Legal Clerk

Subscribed and sworn to before me
7th day of June, 2016

Leslie Nagy

Notary Public
Leslie Nagy



OFFICIAL SEAL
LESLIE NAGY
NOTARY PUBLIC STATE OF NEW MEXICO

My commission expires _____

My Commission Expires: 05/24/2019

Copy of Publication

LEGAL 45647
June 5, 2016
June 7, 2016

**PUBLIC NOTICE
CORRECTIVE
ACTION COMPLETE
PROPOSAL
for SOLID WASTE
MANAGEMENT
UNIT 127
at CANNON AIR
FORCE BASE**

Notice of Petition (Propo-
posal) for a Resource
Conservation and Re-
covery Act (RCRA)
Class 3 Permit Modifi-
cation from Cannon Air
Force Base (AFB), in
Curry County, New
Mexico (NM). Cannon
AFB submitted a Cor-
rective Action Complete
Proposal for Solid
Waste Management
Unit (SWMU) 127 to the
New Mexico Environ-
ment Department
(NMED) that requests a
change in corrective ac-
tion status.

The Permit Modification
requests a change in
status from Corrective
Action Required to Cor-
rective Action Complete
with Controls for SWMU
127.

A 60-day public comment
period will begin on
June 5, 2016 and end
on August 4, 2016.
Throughout the 60-day
comment period, the
Proposal may be
viewed at Clovis-Carver
Public Library Monday
through Thursday from
9 a.m. to 9 p.m. and
Friday through Satur-
day from 9 a. m. to 5
p.m. The Proposal is
available behind the
reference desk. The li-
brary phone number is
575 769-7840.

A Public Meeting will be
held on Monday, June
20, 2016 at 6:00 PM at
the Clovis-Carver Pub-
lic Library, 701 N. Main
Street, Clovis, NM
88101.

If you would like to pro-
vide any written com-
ments or questions re-
garding this Proposal,
they can be submitted
to either:

27th SOW Public Affairs
110 Alison Ave., Suite
1150
Cannon AFB, NM 88103
575-784-4131
27SOWPA.publicaffairs
@us.af.mil

or to:

Mr. John Kieling,
Chief, Hazardous Waste
Bureau
New Mexico Environment
Department
2905 Rodeo Park Drive
East, Bldg 1
Santa Fe, NM 87505-
6303
Phone 505-476-6000
Fax 505-476-6030

The Permittee's compli-
ance history during the
life of the Permit being
modified is available
from the NMED Contact
Person referenced
above.

AFFIDAVIT OF LEGAL PUBLICATION

LEGAL # 45652

Copy of Publication

STATE OF NEW MEXICO
COUNTY OF ROOSEVELT:

The undersigned, being duly sworn, says:
That she is a Legal Clerk of
The PORTALES NEWS-TRIBUNE, a daily
Newspaper of general circulation,
published in English at Portales,
said county and state, and that the
hereto attached

PUBLIC NOTICE
LEGAL 45652 JUNE 5, 2016

was published in said PORTALES NEWS-TRIBUNE,
a daily newspaper duly
qualified for that purpose within
the meaning of Chapter 167 of the
1937 Session Laws of the State of
New Mexico for 2 consecutive
days/weeks on the same days as follows:

06/05/2016 06/07/2016

Gammy Dewby

Legal Clerk

Subscribed and sworn to before me
7th day of June, 2016

Leslie Nagy

Notary Public
Leslie Nagy



OFFICIAL SEAL
LESLIE NAGY
NOTARY PUBLIC STATE OF NEW MEXICO

My Commission Expires: 05/24/2019 My commission expires _____

Legal 45652
June 5, 2016
June 7, 2016

**PUBLIC NOTICE
CORRECTIVE
ACTION COMPLETE
PROPOSAL
for SOLID WASTE MAN-
AGEMENT
UNIT 127
at CANNON AIR
FORCE BASE**

Notice of Petition (Propo-
sal) for a Resource Conser-
vation and Recovery Act
(RCRA) Class 3 Permit
Modification from Cannon
Air Force Base (AFB), in
Curry County, New Mexico
(NM). Cannon AFB submit-
ted a Corrective Action
Complete Proposal for Solid
Waste Management Unit
(SWMU) 127 to the New
Mexico Environment Depart-
ment (NMED) that requests
a change in corrective ac-
tion status.

The Permit Modification re-
quests a change in status
from Corrective Action Re-
quired to Corrective Action
Complete with Controls for
SWMU 127.

A 60-day public comment
period will begin on June 5,
2016 and end on August 4,
2016. Throughout the 60-
day comment period, the
Proposal may be viewed at
Clovis-Carver Public Library
Monday through Thursday
from 9 a.m. to 9 p.m. and
Friday through Saturday
from 9 a. m. to 5 p.m. The
Proposal is available behind
the reference desk. The li-
brary phone number is 575
769-7840.

A Public Meeting will be
held on Monday, June 20,
2016 at 6:00 PM at the Clo-
vis-Carver Public Library,
701 N. Main Street, Clovis,
NM 88101.

If you would like to provide
any written comments or
questions regarding this
Proposal, they can be sub-
mitted to either:

27th SOW Public Affairs
110 Alison Ave., Suite
1150
Cannon AFB, NM 88103
575-784-4131
27SOWPA.publicaffairs
@us.af.mil

or to:

Mr. John Kieling,
Chief, Hazardous Waste
Bureau
New Mexico Environment
Department
2905 Rodeo Park Drive
East, Bldg 1
Santa Fe, NM 87505-6303
Phone 505-476-6000
Fax 505-476-6030

The Permittee's compli-
ance history during the life
of the Permit being modified
is available from the NMED
Contact Person referenced
above.

ATTACHMENT 2



DEPARTMENT OF THE AIR FORCE
27TH SPECIAL OPERATIONS CIVIL ENGINEER SQUADRON (AFSOC)
CANNON AIR FORCE BASE NEW MEXICO

Brandy Chavez
Environmental Element Chief
402 S. Chindit Blvd.
Bldg. 102
Cannon AFB, NM 88103-5003

June 02, 2016

SUBJECT: Public Notice for a Class 3 Permit Modification Request

Dear Interested Citizen:

Enclosed is the Public Notice regarding a Class 3 Permit Modification request to modify the Resource Conservation and Recovery Act (RCRA) Permit NM7572124454 issued to Cannon Air Force Base, U.S. Department of Defense.

If approved, the proposed modification would grant a change in status from Corrective Action Required to Corrective Action Complete with Controls for Solid Waste Management Unit (SWMU) 127.

The enclosed Public Notice provides the location at which the related supporting documentation for this Permit Modification request can be reviewed, information regarding the public meeting, and procedures for submitting comments. Written comments must be based on the Cannon AFB proposal/supporting documentation. The Cannon AFB proposal/supporting documentation may be reviewed at the following location during the public comment period:

Clovis-Carver Public Library
701 N. Main Street
Clovis, NM 88101
Phone (575) 769-7840
Monday – Thursday from 9:00 a.m. to 9:00 p.m.
Friday – Saturday from 9:00 a.m. to 5:00 p.m.

The sixty (60) day comment period began on June 05, 2016 and will continue until August 04, 2016. After consideration of all written public comments received, the New Mexico Environment Department, Hazardous Waste Bureau will notify the public of its intended decision on the modification. The following individuals will be notified of the intended decision by mail: persons included on the mailing list that provided written comments or persons who requested notification in writing.

Sincerely,

Brandy Chavez

BRANDY CHAVEZ
Environmental Element Chief

Enclosure

AIR COMMANDOS

PUBLIC NOTICE
CORRECTIVE ACTION COMPLETE PROPOSAL
for SOLID WASTE MANAGEMENT UNIT 127
at CANNON AIR FORCE BASE

Notice of Petition (Proposal) for a Resource Conservation and Recovery Act (RCRA) Class 3 Permit Modification from Cannon Air Force Base (AFB), in Curry County, New Mexico (NM). Cannon AFB submitted a Corrective Action Complete Proposal for Solid Waste Management Unit (SWMU) 127 to the New Mexico Environment Department (NMED) that requests a change in corrective action status.

The Permit Modification requests a change in status from Corrective Action Required to Corrective Action Complete with Controls for SWMU 127.

A 60-day public comment period will begin on June 5, 2016 and end on August 4, 2016. Throughout the 60-day comment period, the Proposal may be viewed at Clovis-Carver Public Library Monday through Thursday from 9 a.m. to 9 p.m. and Friday through Saturday from 9 a. m. to 5 p.m. The Proposal is available behind the reference desk. The library phone number is 575 769-7840.

A Public Meeting will be held on Monday, June 20, 2016 at 6:00 PM at the Clovis-Carver Public Library, 701 N. Main Street, Clovis, NM 88101.

If you would like to provide any written comments or questions regarding this Proposal, they can be submitted to either:

27th SOW Public Affairs
110 Alison Ave., Suite 1150
Cannon AFB, NM 88103
575-784-4131
27SOWPA.publicaffairs@us.af.mil

or to:

Mr. John Kieling,
Chief, Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Bldg 1
Santa Fe, NM 87505-6303
Phone 505-476-6000
Fax 505-476-6030

The Permittee's compliance history during the life of the Permit being modified is available from the NMED Contact Person referenced above.

ATTACHMENT 3

 **27th Special Operations Wing** 

**Corrective Action Complete Proposal for
SWMU 127 at Cannon Air Force Base**



This Briefing is:
UNCLASSIFIED June 20, 2016

 **Roles and Responsibilities** 

Brian Renaghan	Contracting Officer's Representative, Air Force Civil Engineering Center (AFCEC)
Brandy Chavez	Environmental Element Chief, Cannon Air Force Base (AFB)
Wayne Bitner	Environmental Restoration Chief, Kirtland AFB
Sheen Kottkamp	Environmental Program Scientist, Cannon AFB (AGEISS, Inc.)
Praveen Srivastav	Project Manager, CB&I Federal Services LLC
William Foss	Technical Lead, CB&I Federal Services LLC
Dezbah Jesus	Regulatory Specialist, CB&I Federal Services LLC

 **Purpose of Meeting** 

- This Public Meeting fulfills the requirement to inform and seek public input regarding the Corrective Action Complete Proposal (CACP) submitted to New Mexico Environment Department (NMED).
- On June 2, 2016, the CACP for Solid Waste Management Unit (SWMU) 127 was submitted to NMED for review and approval.
- SWMU 127 is also known as the Petroleum, Oil and Lubricants (POL) Wash Pad at Facility 4095.
- The CACP summarizes corrective action activities at the site.

 **Permit Modification Process** 

- On June 2, 2016, Cannon Air Force Base (AFB) submitted the SWMU 127 CACP to NMED for review and approval.
- The CACP included a Class 3 Permit Modification Request to change the status of SWMU 127 from Corrective Action Required to Corrective Action Complete (CAC) with Controls.
- CAC with Controls generally means that the site has been cleaned up to allow use of the property for industrial or commercial purposes. However, the site is not suitable for residential use.

 **Permit Modification Process, continued** 

- On June 5, 2016 and June 7, 2016 a public notice was published in the *Clovis News Journal* and the *Portales News-Tribune* informing the public of the CACP and the requested Class 3 Permit Modification.
- A 60-day comment period is required to allow public input and extends from June 5, 2016 through August 4, 2016.
- Following the 60-day public comment period, the NMED will review the CACP.
- NMED will notify the public of their intended decision by publishing a Statement of Basis and a Public Notice.
- The public will have 60 days to comment on the intended decision.

 **Permit Modification Process, continued** 

- Upon NMED completion of the Statement of Basis process, the permit will be modified.
- SWMU 127 will be removed from Table 1 "List of SWMUs and Areas of Concern (AOCs) Requiring Corrective Action"
- SWMU 127 will be added to Table 2 "List of SWMUs and AOCs with Corrective Action Complete with Controls Status."

 **SWMU 127: Location & History** 



 **SWMU 127: Location & History, continued** 

- SWMU 127 is located within the fuels yard associated with Building 216 adjacent to an asphalt parking lot and roadway.
- SWMU 127 is known as the POL Wash Pad at Facility 4095 and includes a sand trap, two leach fields, and an Oil Water Separator (OWS)
- The leach field was active from 1977 to 1990 and was replaced with a new leach field and oil water separator in 1991.
- The leach field reportedly ceased to function in the late 1980's.

 **SWMU 127: Location & History, continued** 

- The old leach field was bypassed, and an OWS enclosed in a concrete vault was installed downstream from the sand trap in 1991.
- The original leach field remains in-place, but is no longer used.
- The wash rack is no longer in service and is no longer used.
- The OWS, bypass conduit, and sand trap were removed in April 2003.

Site Summary: SWMU 127

Investigation and Remediation History

- 1994 - Phase I Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI)
- 1995 - Phase II RFI
- 2000 - Corrective Measures Study
 - Includes Human Health Risk Assessment and Ecological Risk Evaluation
- 2008 - Voluntary Corrective Action (VCA)
- 2010 - NMED Request for Final Risk Screening
- 2012 - Technical Evaluation Report
- 2014 - Final Risk Screening Evaluation
- 2015 - Revision 2 Final Risk Screening Evaluation







Site Summary: SWMU 127

Investigation and Risk Screening Evaluation Findings

- 1993 and 1994 RFI samples contained elevated concentrations of total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), and semi-volatile organic compounds (SVOCs).
- The 2000 Corrective Measures Study concluded that there was no unacceptable risk to human or ecological receptors, but the study did not evaluate the potential for vapor intrusion into a hypothetical building on the site.
- The 2008 VCA samples were collected to identify areas for potential excavation, but did not confirm the previous TPH exceedances and risk screening indicated no unacceptable human health risk based on the 2008 data.

Site Summary: SWMU 127

Investigation and Risk Screening Evaluation Findings

- In 2010, NMED requested:
 - Documentation of the current use status of the wash pad
 - A final risk evaluation that included all data (1993, 1994, and 2008) and the inhalation pathway
- A 2012 Technical Evaluation Report documented communications that indicated the OWS was removed, but no removal report was available.
- The 2014 Risk Screening Evaluation performed the evaluation requested in the 2010 NMED correspondence and concluded that there was no unacceptable risk to human receptors.

 **Site Summary: SWMU 127** 

Investigation and Risk Screening Evaluation Findings

- In 2014, NMED requested collection of soil gas to support the vapor intrusion risk evaluation.
- The 2015 Revision 2 of the Risk Screening Evaluation satisfied NMED's requests for additional data collection and concluded that the site conditions were acceptable for commercial and/or industrial use.
- NMED approved the Revision 2 Final Risk Screening Evaluation on March 18, 2016 and indicated that a Class 3 Permit Modification Request and CACP could be submitted to change the status of SWMU 127 to Corrective Action Complete with Controls.

 **Questions or Comments** 

Thank you for your participation!

Additional Information Available From:
 Cannon Air Force Base
 27th Special Operations Wing Public Affairs Office
 (575) 784-4131

Please Submit Comments to:
 John Kieling, Bureau Chief
 Hazardous Waste Bureau
 New Mexico Environment Department
 2905 Rodeo Park Drive East, Building 1
 Santa Fe, New Mexico 87505

LIST OF ACRONYMS

AFB	Air Force Base
AFCEC	Air Force Civil Engineering Center
AOC	Area of Concern
CAC	Corrective Action Complete
CACP	Corrective Action Complete Proposal
NMED	New Mexico Environment Department
OWS	Oil Water Separator
POL	Petroleum, Oil and Lubricants
RCRA	Resource Conservation and Recovery Act
RFI	RCRA Facility Investigation
SVOC	semi-volatile organic compound
SWMU	Solid Waste Management Unit
TPH	total petroleum hydrocarbons
VCA	Voluntary Corrective Action
VOC	volatile organic compound