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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 2, 2016

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

**RE: APPROVAL WITH MODIFICATIONS
ACCELERATED CORRECTIVE MEASURE COMPLETION REPORT
SITE FT006-FIRE DEPARTMENT TRAINING AREA NO. 1
CANNON AIR FORCE BASE, NEW MEXICO
EPA ID #NM7572124454
HWB-CAFB-16-004**

Dear Colonel Gilpin:

The New Mexico Environment Department (NMED) has received Cannon Air Force Base's (Permittee) *Accelerated Corrective Measures Completion Report, Site FT006-Fire Training Area No. 1* (Report), dated April 15, 2016 and received April 18, 2016. NMED has completed review of the Report and issues this Approval with Modifications. The Permittee must address the following modifications.

MODIFICATIONS

1. Additional Sampling Required for Corrective Action Complete Without Controls Status Determination

NMED Comment: In order to support a corrective action complete without controls status for Site FT006-Fire Training Area No. 1 (FT006), additional sampling is required to address the exceedances of the total petroleum hydrocarbon (TPH) residential soil screening level (SSL) at boring location 6A. The results of the initial investigation at FT006 were presented

in the 1987 *Resource Conservation and Recovery Act Facility Assessment Cannon Air Force Base* (RFA). The corrective measures, sampling, and conclusions of the Report only address TPH and lead concentrations identified during the 1992 and 2010 soil sampling investigations. The TPH analytical results provided in the RFA indicate residual TPH concentrations above the current (July 2015) NMED residential SSL for TPH to a depth of approximately 48 feet below ground surface (bgs) at boring location 6A. Based on this information, FT006 qualifies for corrective action complete with controls status (industrial use only) and must remain on Table 2 of the facility Permit.

In order to demonstrate that natural attenuation has reduced TPH concentrations to levels below residential SSLs at boring location 6A and no additional elevated TPH or lead concentrations exist at unsampled areas across the site, a work plan for additional sampling must be submitted to include the following:

- A soil boring must be advanced to a depth of sixty feet bgs or until vertical delineation of contamination is achieved at boring location 6A. Soil samples must be collected at the surface and at two-foot intervals to ten feet bgs. Sampling beyond ten feet bgs must be conducted at five-foot intervals to a depth of thirty feet bgs and at ten-foot intervals thereafter. All surface and subsurface soil samples must be submitted to a laboratory and analyzed for TPH (gasoline range organics (GRO), diesel range organics (DRO), and oil range organics (ORO)) using modified Environmental Protection Agency (EPA) Method 8015.
- In order to provide additional delineation of contamination at FT006, a minimum of four additional soil borings must be advanced in the surrounding areas of borings 6A and 6B to a depth of ten feet bgs or until vertical delineation of contamination is achieved in areas not previously sampled across FT006. Soil samples must be collected at the surface and at two-foot intervals to ten feet bgs. If necessary, sampling below ten feet bgs must be conducted at five-foot intervals. Surface and subsurface soil samples must be submitted to a laboratory and analyzed for TPH (GRO, DRO, and ORO) and total lead using EPA Method 6010.
- Should the additional sampling identify TPH concentrations above residential SSLs in subsurface soils, sampling will be required at boring location 785 where TPH was reported at a concentration of 12,500 mg/kg in surface soils. Additional subsurface soil samples must be collected below the limit of the excavation at two-foot intervals to ten feet bgs or until vertical delineation of contamination is achieved. If necessary, sampling below ten feet bgs must be conducted at five foot intervals. Subsurface soil samples must be submitted to a laboratory and analyzed for TPH (GRO, DRO, and ORO).

2. Table 2.1, FT006 Historical Soil Analytical Data

NMED Comment: The following issues were noted during review of Table 2.1, FT006 Historical Soil Analytical Data.

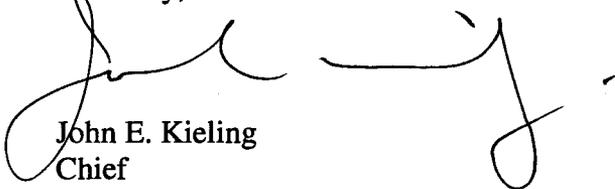
- a. There appears to be a discrepancy between the Report and the approved July 2014 *Accelerated Corrective Measures Work Plan Site FT006-Fire Department Training Area No.1* (Work Plan) with regard to 1,1,2-trichloroethane, which was listed as a detected chemical of concern (COC) for sample location 786 at 0.5 feet bgs at a concentration of 0.001 milligrams per kilogram (mg/kg) in the Work Plan. The Report indicates the detected trichloroethane concentration is for 1,1,1-trichloroethane. The reported concentration did not exceed the residential SSLs for either COC.
- b. The concentration for cadmium at soil sample location 781 at 12 feet bgs was reported as not detected; however, cadmium was previously reported in the Work Plan as detected at a concentration of 0.9 mg/kg. The concentration reported in the Work Plan did not exceed the residential SSL for cadmium.
- c. TPH was reported as detected at a concentration of 94.6 mg/kg for sample location 781 at 6 feet bgs in the Report; however, the concentration was reported as not detected in the Work Plan. TPH was also reported as not detected in Report Figure 2-5. The concentration reported in Report Table 2.1 did not exceed the residential SSL for TPH.
- d. The concentration for calcium was reported as 1.51E+05 mg/kg for sample location 782 at 12 feet bgs in the Report; however, the concentration was previously reported as 1.51E+04 mg/kg in the 2010 *Resource Conservation and Recovery Act Facility Investigation for SWMU 34, 78, 85, 91, 95, and 107 Addendum Report* (RFI).
- e. Soil Screening levels are available for essential nutrients in Section 5.1 of NMED's July 2015 *Risk Assessment Guidance for Site Investigations and Remediation* for calcium, chloride, magnesium, phosphorous, potassium, and sodium. The SSLs for essential nutrients must be considered during screening of soil sample analytical results as applicable.
- f. Concentration data from the 1987 RFA soil sampling investigation must be presented in Table 2.1 and the conclusions and supporting sections of the report revised as necessary to consider the omitted RFA analytical data. The Permittee must consider, present, and evaluate all prior assessment information in order to adequately support a claim for corrective action complete for any solid waste management unit or area of concern.
- g. The Permittee must ensure that all information presented in supporting data tables and figures for all submittals is accurate and complete. Provide a response to each of the

issues in a response letter. In addition, revise Table 2.1, Figure 2.5, and any other text, table, or figure in the report to make the corrections identified above.

The Permittee must provide revised Report replacement pages that include the corrections referenced in this letter; a response letter that addresses NMED's numbered comments; and an electronic redline strikeout version of the revised Report pages to NMED by **January 30, 2017**. A work plan that addresses NMED's requirements for additional borings, soil sampling, and analysis must be submitted by **March 31, 2017**.

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

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

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