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ENVIRONMENT DEPARTMENT



**ENTERED**



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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

November 28, 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 WORK PLAN (ACMWP)  
SITE SW127  
CANNON AIR FORCE BASE, NEW MEXICO  
EPA ID #NM7572124454  
HWB-CAFB-16-007**

Dear Colonel Gilpin:

The New Mexico Environment Department (NMED) has received Cannon Air Force Base's (Permittee) *Accelerated Corrective Measures Work Plan (ACMWP) Site SW127* (Work Plan), dated July 2016 and received July 29, 2016. NMED has completed review of the Work Plan and issues this Approval subject to the following modifications.

**MODIFICATIONS**

**1. Section 4.1, State the Problem, Page 4-1**

**Permittee's Comment:** "If the historical surface soil samples were to be proven to have remediated via natural attenuation over time (22 years), the remaining contaminant concentrations would be below current (2015) NMED residential [Soil Screening Levels] SSLs. Therefore, FPM/URS propose resampling the historical boring locations where exceedances of the NMED residential SSLs for [total petroleum hydrocarbons] TPH have been identified."

**NMED Comment:** Based on the results of previous sampling events, additional sampling does not appear to be an effective means to address the polycyclic aromatic hydrocarbons (PAHs) concentrations which exceeded the NMED residential soil screening level at the site. The additional proposed sampling may yield similar results to prior investigations or may not be representative of the previously defined site conditions. Additionally, the NMED target cancer risk level was exceeded for the residential receptor in soil for organics with PAHs as the primary contributor. Therefore, the Permittee must remove impacted soils at all identified locations where concentrations of chemicals of concern (COCs) were detected above the residential screening level as defined in the Work Plan and as dictated by the results of the proposed confirmation sampling. Present the results of the soil excavation and sampling in separate report.

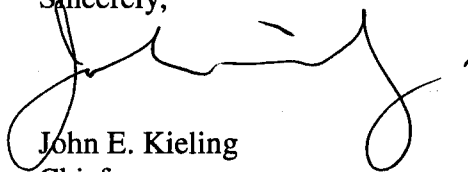
**2. TPH Risk Screen for Soil Boring 12716, Page 5-2**

**NMED Comment:** The Permittee should consider providing lines of evidence to demonstrate that exposure pathways for the isolated contamination above the NMED residential SSL for TPH reported at 48 to 50 feet bgs at soil boring location 12716 are not complete for humans, ecological receptors, or groundwater.

The Permittee must revise the report to address NMED's numbered comments, and replacement pages must be provided where changes were made. The replacement pages must be accompanied by a response letter that cross references NMED's numbered comments and provide an electronic redline strikeout copy of the revised pages. The required submittals must be provided by **January 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

cc: D. Cobrain, NMED HWB  
B. Wear, NMED HWB  
G. Acevedo, NMED HWB  
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File: CAFB 2016 and Reading, CAFB-16-007