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RECEIVED

Mr. David Cobrain  
New Mexico Environment Department (NMED)  
Hazardous Waste Bureau  
2905 Rodeo Park Dr. E/Bldg 1  
Santa Fe, NM 87505

DEC 15 2017

NMED  
Hazardous Waste Bureau

RE: Technical Review of the responses to Notice of Deficiency comments and the *RCRA Facility Investigation at SD012, SD017, and SD020 – Revision 1*, Cannon Air Force Base (CAFB), dated September 2017.

Dear Mr. Cobrain:

The letter addresses the technical review responses NOD comments and incorporation of changes in the *RCRA Facility Investigation at SD012, SD017, and SD020 – Revision 1*, dated September 2017.

All of the risk assessment comments have been adequately addressed. In summary, the revised report has been modified as follows:

- The risk assessments incorporate all historical data;
- Site attribution analyses were conducted in accordance with the NMED soil screening guidance to include statistical comparisons of site data to background;
- Total petroleum hydrocarbons are addressed and compared to appropriate screening levels;
- The screening level for total chromium has been applied;
- The vapor intrusion pathway has been addressed;
- Updates were made to the conceptual site models; and
- Ecological risk assessments have been included.

The revised human health assessment included use of target organ speciation; this is an acceptable practice. However, there is a discrepancy between the construction worker risk assessment (Table E-37) and the results of the refined assessment provided on page 5-17 of the report. Table E-37 clearly shows elevated hazard indices for the urinary system and the nervous system, which is inconsistent with the conclusions and data provided on page 5-17. These should be revised for consistency.

For ecological risk, it was noted that there was elevated risk due to barium and selenium. However, sufficient lines of evidence were provided in the uncertainty section to conclude that the elevated levels of barium and selenium would not adversely impact ecological populations.

*Draft Deliverable: not a final work product*

It is agreed that SD012 and SD017 meet the criteria for corrective action complete without controls. Depending on the evaluation of the discrepancies for the construction worker, SD020 may or may not require controls.

If you have any questions, please contact me at (801) 451-2864 or via email at [pwalton@aqsnnet.com](mailto:pwalton@aqsnnet.com).

Thank you,



Paige Walton  
AQS Senior Scientist and Program Manager

cc: Gabriel Acevedo, NMED (electronic)  
Joel Workman, AQS (electronic)