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Governor
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Lieutenant Governor

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous Waste Bureau

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BUTCH TONGATE
Cabinet Secretary
J. C. BORREGO
Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

August 22, 2018

Colonel Stewart A. Hammons
Commander, 27th Special Operations Wing
110 E. Alison Avenue, Suite 1098
Cannon Air Force Base
New Mexico 88103

**RE: APPROVAL WITH MODIFICATIONS
TECHNICAL MEMORANDUM LONG-TERM MAINTENANCE
ACTIVITIES AT LF005
CANNON AIR FORCE BASE, NEW MEXICO
EPA ID #NM7572124454
HWB-CAFB-18-002**

Dear Colonel Hammons:

The New Mexico Environment Department (NMED) has reviewed the Cannon Air Force Base (Permittee) *Technical Memorandum Long-Term Maintenance Activities at LF005 [Landfill No. 005/Solid Waste Management Unit (SWMU) 113]* (Report), dated April 25, 2018. NMED hereby issues this Approval with the following modifications.

MODIFICATIONS

1. Attachment 3, Table 1, LF005 Subsidence Repair Backfill Material

NMED Comment: The following issues were noted for information provided in the attachment. NMED's comments must be addressed, and corresponding replacement pages provided:

- a. Revise the attachment table to reflect the appropriate NMED residential soil screening level (SSL) for evaluation of total petroleum hydrocarbons (TPH) (1,000

milligrams per kilogram (mg/kg)). NMED Risk *Assessment Guidance for Site Investigations and Remediation* (RA Guidance), Section 6.2, Total Petroleum Hydrocarbons in Soil, provides guidance for evaluation of TPH contamination and appropriate screening level information.

- b. Revise the attachment table to reflect the appropriate NMED residential SSL for arsenic, which is the more conservative cancer SSL of 7.07 mg/kg.
- c. Revise the attachment table to reflect the appropriate NMED residential SSL for evaluation of chromium, which is the more conservative cancer SSL of 96.6 mg/kg.
- d. Provide a reference to the NMED 2017 RA Guidance and Table A-1: NMED Soil Screening Levels used for evaluation of concentration data in the table notes.

2. Backfill Certification Document Information

NMED Comment: NMED has reviewed the provided backfill certification information included as a separate submittal with the Report. The document included a certification letter and supporting attachment information as prepared by Little Gator Trucking and Construction, LLC (LGT) and the Permittee.

Report Attachment 3, Table 1, LF005 Subsidence Repair Backfill Material was also provided as a table titled Attachment 2, Backfill Analysis Summary-SW-113 (LF005) Subsidence Completion Report December 2017 and must be revised in accordance with comment above.

Based on the provided information, the backfill soils from the LGT borrow pit may continue to be used at the LF005 project site without further sampling. Any change to the LF005 backfill borrow pit source will require additional sampling and NMED concurrence.

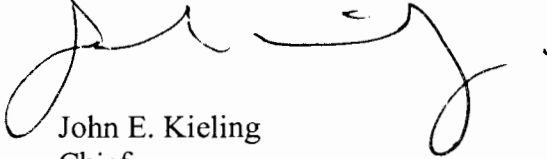
The LGT backfill certification information must be provided as an additional Report appendix, which must be referenced appropriately in the Report text. Revise all affected sections of the Report and provide corresponding replacement pages and the required additional appendix.

The Permittee must provide replacement pages that address NMED's modifications, a response letter that cross-references where NMED's modifications were addressed, an electronic redline-strikeout version of the replacement pages showing where all changes were made and a revised electronic copy of the Report to NMED no later than **October 31, 2018**.

Col. Hammons
August 22, 2018
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If you have questions regarding this letter, please contact Gabriel Acevedo at (505) 476-6043.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kielling". The signature is fluid and cursive, with a large loop at the end.

John E. Kielling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED
B. Wear, NMED HWB
G. Acevedo, NMED HWB
L. King, EPA Region 6 (6MM-RC)
R. Lancaster, CAFB
S. Kottkamp, CAFB
M. Fuchs, CAFB
D. Canales, CAFB

File: CAFB 2018 and reading, CAFB-18-002