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State of New Mexico  
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BUTCH TONGATE  
Cabinet Secretary  
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Deputy Secretary

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

August 31, 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  
RCRA FACILITY INVESTIGATION AT TU504  
CANNON AIR FORCE BASE, NEW MEXICO  
EPA ID #NM7572124454  
HWB-CAFB-16-009**

Dear Colonel Hammons:

The New Mexico Environment Department (NMED) has reviewed the Cannon Air Force Base (Permittee) *RCRA Facility Investigation at TU504 [Hospital Abandoned Underground Storage Tank (UST)/Area of Concern GG\*\* POL Storage Tank No. 1400]-Revision 1* (Report), received December 22, 2017. NMED has completed review of the Report and hereby issues this Approval with the following modifications.

**MODIFICATIONS**

**1. Section 5.4.2, Quantitative Risk Screening Evaluation, Pg. 5-3**

**Permittee Statement:** "A quantitative screening evaluation was completed in accordance with the 2015 NMED risk assessment guidance."

**NMED Comment:** While the methodology for the screening risk evaluation was developed using the 2015 NMED *Risk Assessment Guidance for Site Investigations and Remediation*

(RA Guidance), the screening values used in the analysis were taken from the 2017 RA Guidance. For completeness, the 2017 RA Guidance must also be cited. Revise the statement and any affected Report sections accordingly and provide corresponding replacement pages.

**2. Section 5.4.2, Quantitative Risk Screening Evaluation, Pg. 5-3**

**NMED Comment:** The table titled Hospital Abandoned UST (TU504) Screening-Level Cumulative Risks and Hazard Indices for Soil lists the carcinogenic risk for site workers as "1E-4E-06". Revise the table to list the correct carcinogenic risk value (4.0E-06) for site workers and provide a replacement page.

**3. Section 5.4.6, Refined Quantitative Risk Screening Evaluation for Soil, Pg. 5-7**

**NMED Comment:** The upper confidence level (UCL) values listed in Section 5.4.6 correspond to the ProUCL values presented in Appendix E, Risk Assessment Tables, Attachment 1, Pro UCLs. However, the UCL values listed on Table E-13, Human Health Quantitative Screening Evaluation Results for TU504 Residential Scenario-95% do not correspond to the Section 5.4.6 UCL values for benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, chrysene, and indeno(1,2,3-cd)pyrene, nor do they correspond to the maximum concentrations for each chemical of concern (COC). Resolve the discrepancy and provide corresponding replacement pages.

**4. Section 5.4.8, Uncertainties, Pg. 5-10**

**Permittee's Statement:** "Although there is uncertainty associated with using the larger interval to assess risks, the use of maximum detected concentrations would lessen the likelihood that risk may have been underestimated, especially since the soil data indicates higher concentrations in the deeper samples."

**NMED Comment:** It is not clear if the statement is referring to the soil data obtained from the 0 to 5-feet below ground surface (bgs) depth interval or all of the soil data collected during the 2013 TU504 site investigation project work. Sample concentration data provided in Report Table 2-4, Summary of RFA [RCRA Facility Assessment] Analytical Data Screening Results Hospital Abandoned UST Site (TU504), indicates the samples from the 0 to 5-feet bgs interval were composites of the entire depth intervals. Clarify the reference to samples collected at deeper sampling depths or revise Table 2-4 to include COC concentrations with the corresponding depth information. Also provide a discussion of the data. Revise the Report accordingly and provide corresponding replacement pages.

The Permittee must provide replacement pages that address all of NMED's modifications, a response letter that cross-references where NMED's modifications were addressed, an electronic redline-strikeout version of the Report showing where all changes were made and a revised electronic copy of the Report to NMED no later than **November 30, 2018**.

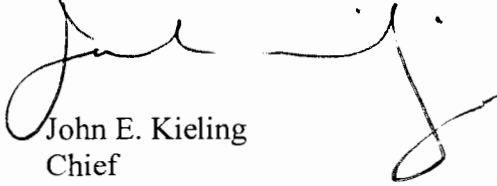
Colonel Hammons

August 31, 2018

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

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kieling". The signature is fluid and cursive, with a large initial "J" and a long horizontal stroke.

John E. Kieling

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-16-009