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ENTERED



James C. Kenney
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Jennifer J. Pruett
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 11, 2019

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 SW006 AND WL102-REVISION 1
CANNON AIR FORCE BASE, NEW MEXICO
EPA ID #NM7572124454
HWB-CAFB-17-004**

Dear Col. Hammons:

The New Mexico Environment Department (NMED) has received the Cannon Air Force Base (Permittee) *RCRA Facility Investigation at SW006 and WL102-Revision 1* (Report), dated May 18, 2018. NMED has reviewed the Report and hereby issues this Approval with the following modifications.

MODIFICATIONS

- 1. Table 2-3, Comparison of Subsurface Soil Concentrations to NMED SSLs [Soil Screening Levels] Removed Tank No. 129 (SW006)**

NMED Comment: The listed Risk-Based soil screening level (SSL) for a Dilution Attenuation Factor (DAF) of 20 for lead (4.23E+00 milligrams per kilogram (mg/kg)) is incorrect. The NMED 2017 Risk Assessment Guidance for Site Investigations and Remediation (RA Guidance) Table A-1: NMED Soil Screening Levels, only lists a New Mexico Groundwater (NMGW)/Maximum Contaminant Level (MCL) Based-SSL for a DAF

of 20 (5.20E-02 mg/kg) for lead. The discrepancy was also noted for Table E-1, Summary of Soil Analytical Soil Results for SW006 0 to 10 Foot Soil Exposure Interval. Revise the Report accordingly and provide corresponding replacement pages. The conclusions of the Report are not expected to be significantly affected by the required modifications.

2. Table 2-4, Comparison of Maximum Subsurface Soil Concentrations to NMED SSLs Wastewater Treatment Effluent Discharge (WL102)

NMED Comment: The following issues were noted for Table 2-4 and must be addressed as follows:

- a. The listed maximum concentrations for m,p-xylenes (1.30E-03 mg/kg), toluene (2.00E-03 mg/kg), 4,4-DDE (5.00E-03 mg/kg), 4,4-DDT (1.00E-03 mg/kg), alpha-chlordane (8.00E-03 mg/kg), gamma-BHC (4.00E-03 mg/kg), and gamma-chlordane (7.00E-03 mg/kg) do not match the concentrations reported in the corresponding table data for each sample. Data tables included in the 2007 *RCRA Facility Investigation of 21 SWMUs* indicate that the concentration data for each collected sample was not converted properly for the units used in Table 2-4. The maximum concentrations for each chemical of concern listed on Table 2-4 and used for the risk evaluation are correct.
- b. The risk-based SSL for a DAF of 20 provided for lead (4.23+00 mg/kg) is incorrect. Correct Table 2-4 to list the correct soil-to-groundwater screening level for lead as listed in RA Guidance Table A-1.

The identified discrepancies were also noted for Table E-8, Summary of Analytical Soil Results for WL102 0 to 10 Foot Exposure Interval. Revise the Report accordingly and provide corresponding replacement pages. The conclusions of the Report are not expected to be significantly affected by the required modifications.

3. Table E-5, Human Health Quantitative Screening Evaluation Results for SW006 Residential Scenario

NMED Comment: An NMED residential cancer endpoint SSL (8.59E+04 mg/kg) is listed for cadmium in RA Guidance Table A-1. Revise Table E-5 to include the residential SSL for cancer and revise the estimated cancer risk calculations. Provide a replacement table and other pages, as appropriate. The conclusions of the Report are not expected to be significantly affected by the required modification.

4. Table E-6, Human Health Quantitative Screening Evaluation Results for SW006 Construction Worker Scenario

NMED Comment: An NMED construction worker cancer endpoint SSL (3.61E+03 mg/kg) is listed for cadmium in RA Guidance Table A-1. Revise Table E-6 to include the construction worker SSL for cancer and revise the estimated cancer risk calculations. Provide a replacement table and other pages, as appropriate. The conclusions of the Report

are not expected to be significantly affected by the required modification.

5. Table E-12, Human Health Quantitative Screening Evaluation Results for WL102 Residential Scenario

NMED Comment: Revise Table E-12 to include the cadmium residential SSL for the cancer endpoint and revise the estimated cancer risk calculations. Provide a replacement table and other pages, as appropriate. The conclusions of the Report are not expected to be significantly affected by the required modification.

6. Table E-13, Human Health Quantitative Screening Evaluation Results for WL102 Construction Worker Scenario

NMED Comment: Revise Table E-13 to include the cadmium construction worker SSL for the cancer endpoint and revise the estimated cancer risk calculations. Provide a replacement table and other pages, as appropriate. The conclusions of the Report are not expected to be significantly affected by the required modification.

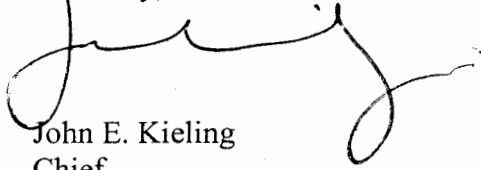
The Permittee must provide replacement pages that address NMED's modifications, a response letter that cross-references where NMED's modifications were addressed, an electronic redline-strikeout version of the replacement pages and a revised electronic copy of the Report to NMED no later than **June 14, 2019**.

This approval is based on the information presented in the document as it relates to the objectives of the work identified by NMED at the time of review. Approval of this document does not constitute agreement with all information or every statement presented in the document.

Col. Hammons
April 11, 2019
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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)
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