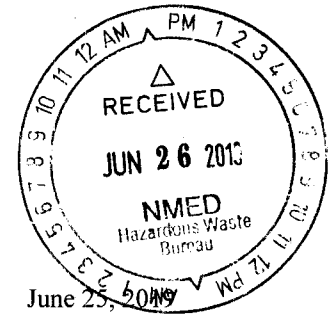




DEPARTMENT OF THE AIR FORCE
AIR FORCE CIVIL ENGINEER CENTER

ENTERED



Christipher N. Gierke
Remedial Project Manager
AFCEC/CZO
Cannon AFB, NM

Mr. John E. Kieling
Chief, Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Bldg. 1
Santa Fe NM 87505-6313

RE: Request for Clarification regarding *Approval with Modifications - RCRA Facility Investigation at TU505, DA508, and TA129, Cannon Air Force Base, New Mexico*

Dear Mr. Kieling

This letter requests clarification regarding the NMED letter, *Approval with Modifications - RCRA Facility Investigation at TU505, DA508, SD022, and TA129*, dated March 19, 2019.

Regarding Modification 3, please clarify the required course of action to achieve "deferred status" for site SD022/SWMU73. Modification 3.c. states "During a future corrective action complete status review by NMED, the Permit will be amended to note a deferred investigation status for SWMU 73." We infer from this statement that the Air Force is to prepare a Permit Modification Request recommending "deferred status." Please advise if that interpretation is correct.

In addition, please advise if we are correct in interpreting the letter as indicating NMED would support the Air Force proceeding to prepare a Corrective Action Complete Proposal/Class 3 Permit Modification Request for sites TU505 and TA129/SWMU129.

The Air Force appreciates the valued working relationship established with you and your department. If you have any further comments or questions pertaining to this request, please contact me, Christipher.Gierke@us.af.mil, (575) 904-6744.

Sincerely,

C.N. GIERKE, GS-12, AFCEC
Remedial Project Manager

Attachment:

NMED Letter, *Approval with Modifications - RCRA Facility Investigation at TU505, DA508, and TA129, Cannon Air Force Base, New Mexico*, dated March 19, 2019

cc:

NMED, David Cobrain
NMED, Gabriel Acevedo
NMED, Benjamin Wear



Michelle Lujan Grisham
Governor

Howie C. Morales
Lt. Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6313
Phone (505) 476-6000 Fax (505) 476-6030
www.env.nm.gov



James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 19, 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 TU505, DA508, SD022, AND TA129
CANNON AIR FORCE BASE, NEW MEXICO
EPA ID #NM7572124454
HWB-CAFB-16-012**

Dear Colonel Hammons:

The New Mexico Environment Department (NMED) has received the Cannon Air Force Base (Permittee) *RCRA Facility Investigation [RFI] at TU505, DA508, SD022, and TA129-Revision 1* (Report), dated May 3, 2018. NMED has completed review of the Report and hereby issues this Approval with the following modifications.

MODIFICATIONS

1. Section 5.2.2, DA508, Page 5-1

Permittee Statement: "Benzo(a)pyrene was detected at concentrations exceeding the NMED residential SSL [soil screening level] in one surface soil sample, SS13."

NMED Comment: Sample result concentration data indicates that the reported Benzo(a)pyrene concentration (2.30E-01 milligrams per kilogram (mg/kg)) did not exceed the NMED residential SSL (1.12 mg/kg). Revise the statement accordingly and provide a corresponding replacement page.

2. Section 5.4.3.1, Comparison of Site Inorganics to Background, Pages 5-12 through 5-14

NMED Comment: The following discrepancies were identified during review of Section 5.4.3.1 and must be addressed as follows:

- a. The statement included in the subsurface background comparison for SD022 states, "Two-sample hypothesis testing was complete [sic] for cadmium because cadmium was not detected in the background data set". The statement must be revised to state "Two-sample hypothesis testing was not completed because cadmium was not detected in the background data set." Revise the statement accordingly and provide a corresponding replacement page.
- b. No ProUCL output file was included in Appendix E.3-SD022 for two-sample hypothesis testing of surface soil data for beryllium. According to the discussion, the analysis was performed; therefore, the data file must be included in Appendix E.3. The ProUCL input file for this analysis is included in Appendix E.3. Revise Appendix E.3 to include complete statistical evaluation input and output data files for all statistical calculations. Provide appropriate replacement pages.
- c. No ProUCL input or output files for selenium were included in Appendix E.3. According to the section discussion, two-sample hypothesis testing was performed for selenium during the SD022 inorganic background evaluation. All input and output files for the statistical analyses performed for SD022 must be included in Appendix E.3. Revise Appendix E.3 accordingly and provide appropriate replacement pages.

3. Section 6.2, Conclusions and Recommendations, Pages 6-5 through Page 6-6

NMED Comment: Report recommendations were noted and are addressed as follows:

- a. TU505, Flight Generator Underground Storage Tank, will be added to the Permit during future corrective action complete status evaluation as an additional SWMU. The status will be determined by NMED based on the results of investigation completed at the time of the evaluation and any additional site information.
- b. The Permittee has stated "In order to address the benzo(a)pyrene contamination identified at DA508 and achieve CAC [corrective action complete] without controls, an accelerated corrective measures Work Plan (ACMWP) will be submitted to NMED." The ACMWP must be submitted to NMED for review and approval no later than **November 29, 2019**.
- c. Based on ongoing use of site SD022/SWMU 73, Storm Water Drainage and Retention Pond, the Permittee has requested further action and investigation at this site be deferred until the site is no longer utilized as a storm water retention pond. SWMU 73 will remain on RCRA Permit (Permit) Table 1, List of Solid Waste Management Units and Areas of Concern Requiring Corrective Action. During a future corrective action complete status

review by NMED, the Permit will be amended to note a deferred investigation status for SWMU 73.

- d. TA129/SWMU 129, Waste Oil Storage Facility will remain on RCRA Permit (Permit) Table 1 pending submittal and NMED review of a Petition for Corrective Action Complete for SWMU 129. The site status will be determined by NMED based on the results of investigation completed at the time of the site status evaluation and any additional available information.

No revisions to the Report are necessary.

4. Section 5.5.3.2, Tier 1 SLERA [Screening Level Ecological Risk Assessment]-SD022, Pages 5-40 through 5-44

NMED Comment: Revise the Tier 1 uncertainty analysis discussion to identify and address the use of alternative risk criteria for evaluating ecological risk for sediment at SD022. As provided for the Tier 2 SLERA, specify if the alternative risk criteria over- or under-estimates risk. Ensure Section 5.6, Uncertainties also addresses the use of alternative risk criteria for the Tier 1 and Tier 2 SLERA. Revise the Report accordingly and provide corresponding replacement pages.

5. Table E-46, Human Health Quantitative Screening Evaluation Results for TA129 Residential Scenario-95% UCL [Upper Confidence Level]

NMED Comment: Review of the risk evaluation results provided in Table E-46, Human Health Quantitative Screening Evaluation Results for TA129 Residential Scenario - 95% UCL indicates that the appropriate screening level and exposure point concentration (EPC) are listed for total chromium; however, an estimated cancer risk result is not presented in the table for total chromium (Estimated Cancer Risk listed as "NA"). The cancer risk estimate for total chromium is 1.10E-6. Revise Table E-46 to list 1.10E-6 as the Estimated Cancer Risk for total chromium, revised the table total estimated cancer risk calculation, and revise any affected Report sections accordingly. Provide all appropriate replacement pages.

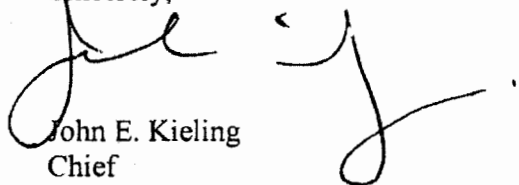
The Permittee must provide replacement pages that address NMED's modifications, a response letter that cross-references where NMED's modifications were addressed, an electronic redline-strikeout version of the replacement pages and a revised electronic copy of the Report to NMED no later than **July 31, 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
March 19, 2019
Page 4

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

File: CAFB 2019 and Reading