



Michelle Lujan Grisham
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NEW MEXICO  ENTERED
ENVIRONMENT DEPARTMENT

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James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 3, 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 WORK PLAN AT DP034 REVISION 1
CANNON AIR FORCE BASE, NEW MEXICO
EPA ID #NM7572124454
HWB-CAFB-18-003**

Dear Col. Hammons:

The New Mexico Environment Department (NMED) is in receipt of the Cannon Air Force Base (Permittee) *RCRA Facility Investigation Work Plan at DP034 Revision 1* (Work Plan), dated May 2019. NMED has reviewed the Work Plan and hereby issues this Approval with the following modifications.

MODIFICATIONS

1. Section 3.6.8, Evaluation of Petroleum Hydrocarbons, Page 3-8

Permittee Statement: “Note that there are no NMED screening guidelines for GRO [gasoline range organics].”

NMED Comment: Soil screening levels (SSLs) for Residential Exposure (100 milligrams per kilogram (mg/kg)) and Industrial/Construction Work Exposure (500 mg/kg) for total petroleum hydrocarbon (TPH) GRO are provided in NMED’s 2019 Risk Assessment Guidance for Site Investigations and Remediation Table 6-2, TPH Soil Screening Levels, and

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Table 6-4, Groundwater and SL-SSLs for TPH Mixtures. Revise the Work Plan accordingly and provide a replacement page.

2. Section 5.5, Waste Management, Page 5-10 through 5-11

Permittee Statement: “If radioactive IDW [Investigation Derived Waste] is generated, the RPM [Radiation Protection Manager] will assist the Site Lead in the proper storage and labeling of radioactive IDW on Cannon AFB property.”

NMED Comment: It is the Permittee’s responsibility to ensure that all applicable state and federal regulatory guidelines for any handling, storage, transportation, and disposal are met for encountered radioactive IDW for protection of human health and the environment.

All IDW management activities conducted during the investigation must be clearly and comprehensively documented in the investigation report. No revisions to the Work Plan are required with respect to this comment.

The investigation report summarizing the results of implementation of the Work Plan must be submitted to NMED no later than **November 22, 2019**.

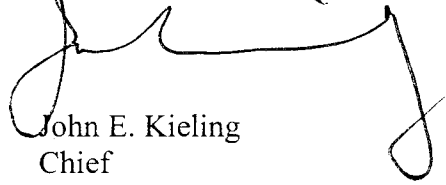
The Permittee must provide a replacement page that addresses NMED’s required modification. In addition, a response letter that cross-references where the modifications were addressed must be provided. The response letter must also be provided as an electronic copy. The replacement page, an electronic copy of the redline-strikeout version of the Work Plan and the revised Work Plan must also be submitted 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.

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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 "K".

John E. Kieling
Chief
Hazardous Waste Bureau

- cc: D. Cobrain, NMED
B. Wear, NMED HWB
G. Acevedo, NMED HWB
L. King, EPA Region 6 (6LCRRC)
R. Lancaster, CAFB
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File: CAFB 2019 and Reading