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James C. Kenney  
Cabinet Secretary

Jennifer J. Pruett  
Deputy Secretary

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

August 8, 2019

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

**RE: APPROVAL WITH MODIFICATIONS  
RCRA FACILITY INVESTIGATION AT SD012, SD017, AND SD020-REVISION 2  
CANNON AIR FORCE BASE, NEW MEXICO  
EPA ID #NM7572124454  
HWB-CAFB-16-010**

Dear Col. Hammons:

The New Mexico Environment Department (NMED) is in receipt of the Cannon Air Force Base (Permittee) *RCRA Facility Investigation at SD012 [Solid Waste Management Unit (SWMU) 85], SD017 [SWMU 96], and SD020 [SWMU 95]-Revision 2* (Report), dated November 26, 2018. NMED has reviewed the Report and hereby issues this Approval with the following modifications.

**MODIFICATIONS**

**1. Section 6.1.5.3, Refined Quantitative Risk Assessment (SD020), Page 6-5**

**NMED Comment:** The following discrepancies were noted for Section 6.1.5.3 and must be addressed as follows:

- a. A discrepancy in the estimated cancer risk for residents (6E-07) for SD020 cited in the section discussion was identified. The refined risk screen evaluation documented on Table E-36, Human Health Quantitative Screening Evaluation Results for SD020 Residential Scenario-Mixed Zone Soil-95% UCL [Upper Confidence Level] Concentrations, indicates that the estimated cancer risk for the residential exposure scenario is 2E-06. Verify that the risk evaluation documented on Table E-36 is accurate. Based on the verification, correct the discrepancy and provide either a corresponding replacement page or table.
  - b. A discrepancy was noted for the estimated hazard quotient for the construction worker (1.31) for site SD020. The refined risk screen evaluation documented on Table E-37, Human Health Quantitative Screening Evaluation Results for SD020 Construction Worker Scenario-Mixed Zone Soil-95% UCL Concentrations, indicates that the estimated hazard quotient for the construction worker is 1.33. Verify that the risk evaluation documented on Table E-37 is accurate. Based on the verification, correct the discrepancy and provide either a corresponding replacement page or table.
2. **Table F-17, Calculated Doses Compared with Oral TRVs [Toxicity Reference Values] for the Deer Mouse-SD020 Using All Selenium Data**

**NMED Comment:** Table F-17 presents calculated dose to TRV comparisons for the horned lark, not the deer mouse. Correct the table title and provide a replacement table.

3. **Table F-8, Summary Statistics and Exposure Point Concentrations for SD020**

**NMED Comment:** The corresponding 95% UCL output spreadsheets for cadmium and vanadium for the 0 to 10 feet below ground surface sample interval were not included in Appendix F or with any other ProUCL data provided with the Report for SD020. The UCL concentrations listed on Table F-8 for cadmium and vanadium were used for calculation of respective hazard quotients and the hazard index for plants for SD020. The missing ProUCL output spreadsheets with corresponding Table F-8 UCLs for cadmium and vanadium must be included in Appendix F of the revised electronic copy of the Report and must also be provided as hard copies with the required response.

The Permittee must provide replacement pages that address NMED's required modifications. 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 pages, an electronic copy of the redline-strikeout version of the Report, and an electronic copy of the revised Report must also be submitted to NMED no later than **September 30, 2019**.

Col. Hammons  
August 8, 2019  
Page 3

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.

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)  
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