



Michelle Lujan Grisham
Governor

Howie C. Morales
Lt. Governor

NEW MEXICO ENVIRONMENT DEPARTMENT **ENTERED**

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

August 15, 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 FL070-REVISION 3
CANNON AIR FORCE BASE, NEW MEXICO
EPA ID #NM7572124454
HWB-CAFB-15-006**

Dear Colonel Hammons:

The New Mexico Environment Department (NMED) has received the Cannon Air Force Base (Permittee) *RCRA Facility Investigation at FL070 (Report)- Revision 3*, dated March 5, 2019. NMED has completed review of the Report and hereby issues this Approval with the following modifications.

MODIFICATIONS

1. Section 5.2.1, Soil Vapor Sample Results, Page 5-2

NMED Comment: The equilibrium water concentration results listed for toluene, m,p-xylene, and o-xylene do not correspond to the respective concentrations for each chemical of concern (COC) listed on Table 5-3, Calculations of Equilibrium Groundwater Concentrations FL070 (SWMU 70). The discrepancy is a result of the order of the COCs, not the equilibrium water concentrations. To limit the potential for any further discrepancy, remove the equilibrium water concentration results from the section discussion, keeping

the reference to Table 5-3. In support of the screening level evaluation, revise Table 5-3 to include the NMED Residential vapor intrusion groundwater and tap water screening levels for each COC. Revise the Report accordingly and provide the respective replacement pages.

2. Section 5.5.5, Refined Quantitative Risk Screening Evaluation for Residents, Page 5-8

Permittee Statement: "To address this exposure uncertainty, the 95% upper confidence level (UCL) was estimated for all chemicals with a minimum of eight samples and six detections using USEPA's statistical software ProUCL, Version 5.1.00."

NMED Comment: A 95% UCL (9.60E-01 milligrams per kilogram (mg/kg)) was listed for silver in Section 5.5.5. UCL output data reports included in Appendix F-Risk Assessment Tables indicate that the data set for silver was not processed due to limited detection of silver (one detection out of eight samples). Therefore, it is assumed that the listed UCL concentration for silver in the section discussion is a discrepancy. The UCL concentration was not used for refined risk calculations. However, for conformance with the Appendix F ProUCL data output report for silver, correct the discrepancy and provide a replacement page.

3. Section 5.5.6, Soil-to-Groundwater Evaluation, Page 5-11

Permittee Statement: "Tap water is not used by Cannon AFB as a domestic water source."

NMED Comment: Water for domestic use is tap water. As currently understood, water for use and consumption at Cannon Air Force Base (CAFB) is sourced from the Ogallala aquifer and may potentially be susceptible to contamination from releases at CAFB. Rephrase the statement for clarity or remove it from the Report. Provide a corresponding replacement page.

Additionally, clarify in the required response that Section 5.5.6 was revised in response to Comment No. 3 of NMED's, September 26, 2018 *Disapproval RCRA Facility Investigation at FLO70- Revision 2*, not Section 5.7.

4. Section 5.7, Site Conceptual Exposure Model, Page 5-13

Permittee Statement: "Arsenic in soil boring SB02 at 9 feet bgs [below ground surface] and SB04 at 5 feet bgs."

NMED Comment: Only the risk-based soil screening level for a dilution attenuation factor of 20 for iron was exceeded at SB04 at 5 feet bgs. Correct the discrepancy and provide a replacement page.

5. Appendix F, Risk Assessment Tables

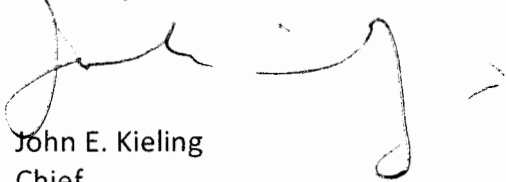
NMED Comment: ProUCL input data sets were not included in Appendix F for aluminum, antimony, arsenic, barium, cadmium, chromium, cobalt, copper, iron, lead, magnesium, manganese, and nickel. Revise Appendix F to include the complete ProUCL metals input data set and provide a hard copy with the required 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 version of the revised Report must also be submitted to NMED no later than **October 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.

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

Sincerely,



John E. Kielling
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
C. Gierke, CAFB
M. Fuchs, CAFB
D. Canales, CAFB

File: CAFB 2019 and Reading