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Certified Mail - Return Receipt Requested

June 24, 2021

Colonel Robert A. Masaitis
Commander, 27th Special Operations Wing
100 Air Commando Way, Suite 100
Cannon Air Force Base
New Mexico 88103-5214

**RE: APPROVAL WITH MODIFICATIONS
ACCELERATED CORRECTIVE MEASURES WORK PLAN SITE DA508
CANNON AIR FORCE BASE, NEW MEXICO
EPA ID #NM7572124454
HWB-CAFB-19-004**

Dear Colonel Masaitis:

The New Mexico Environment Department (NMED) is in receipt of the Cannon Air Force Base (Permittee) *Accelerated Corrective Measures Work Plan Site DA508* (Work Plan) dated November 5, 2019. NMED has reviewed the Report and hereby issues this Approval with the following modifications that must be addressed.

MODIFICATIONS

1. Section 1.3, Regulatory Framework, Pages 1-1 and 1-2

NMED Comment: The following issues must be addressed as follows:

- a. The term "unlimited use/unrestricted exposure standards" used in Section 1.3 and Section 5.5, ACMCR [Accelerated Corrective Measures Completion Report] is a CERCLA term and does not apply to RCRA corrective action. Remove the reference from the Work Plan and provide respective replacement pages.
- b. The August 22, 2011 *Site Investigation at Eight Sites Project Activities Work Plan*, Appendix D, Historical Site Information, included site reconnaissance information about DA508 and stated that "[t]his mounded area [DA508] may be from the disposal of debris that was removed from the adjacent FTA [Fire Training Area] #3.

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

There is another site (SWMU [Solid Waste Management Unit] 107 FTA #3) located to the south and west of the surface disposal." An exceedance of the applicable soil screening level for perfluorooctanesulfonic acid was reported in surface soils at SWMU 107 in the August 2018 *Final Site Inspection Report Cannon Air Force Base, NM [New Mexico] Site Inspection of Aqueous Film Forming Foam (AFFF) Release Areas Environmental Programs Worldwide*. Although, environmental media sampling for per- and polyfluorinated alkyl substances (PFAS) is not a part of the proposed corrective measures scope of work for DA508, the absence of data and information pertaining to potential PFAS contamination at DA508 will affect any future site status determination. Revise the site history information provided in the Work Plan to include all available information and discuss the complete site history. Provide appropriate replacement pages for the Work Plan.

2. Section 1.5, Project Schedule, Pages 1-7

NMED Comment: Revise the Work Plan schedule to reflect updated project scheduling. The Accelerated Corrective Measures Completion Report must be submitted to NMED no later than **June 30, 2022**. Revise the Work Plan accordingly and provide a replacement page.

3. Section 3.1, DA508 Site Description, Conditions, and Background, Pages 3-1

NMED Comment: The following issues identified for information provided in Section 3.1 must be addressed as follows:

- a. The Permittee stated that "[t]he surface disposal site was identified in 2009 while URS was conducting an investigation at an adjacent site." Provide additional information on the site adjacent to DA508 that is referenced in the statement. Revise the Work Plan accordingly and provide replacement pages.
- b. The Permittee stated that "[a]n unpaved roadway (a former runway) is located to the west of DA508 followed by a fire training area to the southwest." Based on readily available site vicinity information, the currently active Cannon Air Force Base (CAFB) fire training area is located to the northwest of DA508 and to the west of the former runway, the SWMU 107 former fire training area is located to the southwest and adjacent to DA508 and east of the former runway, and SWMU 108, the active EOD [Explosives and Ordnance Disposal] area, is located to the southwest of the site and west of the former runway. Revise the Work Plan to provide accurate location information for surrounding SWMUs 107, 108, and the Active Fire Training Area (AOC JJJ) and provide replacement pages.

4. Section 3.2.1, Final Evaluation Report (URS 2009), Page 3-2

NMED Comment: Provide a copy of the referenced August 2009 *Final Evaluation Report, Air Force Compliance Clean-up Site, Identification and Evaluation of DERA Eligibility for AFCEC, Multiple Locations* cited in the Work Plan to NMED. This document has not been included in NMED's Administrative Record for CAFB. All documents that are referenced in any submittal to NMED must be provided for the Administrative Record.

5. Section 4.1, State the Problem, Page 4-1

Permittee Statement: "To address all potential concerns regarding arsenic at DA508, the arsenic identified in the surface soils exceeding background at surface soil sample DA508-SS03 will be excavated and disposed of off-site. Following the removal of arsenic soils from this location, the remaining arsenic concentrations identified at DA508 will be considered background concentrations and arsenic will not be included in the cumulative risk assessment calculations following the removal of PAH soils at DA508."

NMED Comment: The Permittee must demonstrate that arsenic does not exceed the established background levels at the excavation area, and therefore, does not need to be retained as a constituent of potential concern in the risk screen evaluation. This must be based on the results of confirmation sampling and comparison to applicable established arsenic background levels for CAFB. Revise the Work Plan accordingly and provide replacement pages.

6. Section 5.3, Confirmation Sampling and Analysis, Page 5-2

Permittee Statement: "Confirmation samples will be analyzed for PAHs [polynuclear aromatic hydrocarbons] (via USEPA [United States Environmental Protection Agency] Method 8270D) or arsenic (via USEPA Method 6010C) depending on the contaminant identified in the excavation."

NMED Comment: In accordance with prior PAH soil sample analysis documented in the April 2018 *RCRA Facility Investigation at TU505, DA508, SD022, and TA129* (see Work Plan Section 3.2.4), all confirmation samples tested for PAHs must be analyzed by EPA Method 8270D with Selected Ion Monitoring (SIM) to ensure that sample analysis detection limits are less than the residential SSLs for PAHs. Revise the sampling plan accordingly and provide replacement pages for both text and affected tables.

7. Section 6.3.6, Quality Assurance/Quality Control Samples [QA/QC], Page 6-9

NMED Comment: The following issue must be addressed as follows:

- a. Equipment blanks must be collected from all sampling apparatus at a frequency of 10 percent for reusable sampling equipment or one per day if disposable sampling equipment is used. Update the Work Plan accordingly and provide replacement pages.
- b. Specify the sample method to be used to analyze required QA/QC samples in the section discussion or reference the appropriate Work Plan section information. Provide a replacement page.

8. Appendix B, Analytical Laboratory Information

NMED Comment: NMED updated the *Risk Assessment Guidance for Site Investigations and Remediation* in June 2019. Ensure that the residential soil screening levels (SSLs) listed in the Reference Limits and Evaluation Tables included in Appendix B are the most recent residential SSLs. Update the Work Plan accordingly and provide respective replacement pages for affected text and tables.

The Permittee must provide replacement pages that address NMED's modifications. In addition, a response letter that cross-references where each of the modifications was addressed must be provided. The response letter must also be provided as an electronic copy. Electronic copies of the redline-strikeout version of the Work Plan and the revised Work Plan must be submitted to NMED no later than **September 17, 2021**. The Accelerated Corrective Measures Completion Report must be submitted to NMED no later than **June 30, 2022**.

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.

Colonel Masaitis
June 24, 2021
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If you have any questions regarding this letter, please contact Gabriel Acevedo at (505) 690-5760.

Sincerely,

Ricardo Maestas Digitally signed by Ricardo Maestas
Date: 2021.06.24 17:07:27 -06'00'

Ricardo Maestas
Acting Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
B. Wear, NMED HWB
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