



**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  
RCRA FACILITY ASSESSMENT AT OW541 AND OW560  
CANNON AIR FORCE BASE, NEW MEXICO  
EPA ID #NM7572124454  
HWB-CAFB-17-007**

Dear Colonel Masaitis:

The New Mexico Environment Department (NMED) is in receipt of the Cannon Air Force Base (Permittee) *RCRA Facility Assessment at OW541 and OW560* (Report) dated November 5, 2019. NMED has reviewed the Report and hereby issues this Approval with the following modifications.

**MODIFICATIONS**

**1. Section 8.0, Conclusions, Page 8-2**

**NMED Comment:** The following comments must be addressed as follows:

- a. Review of Report data tables and respective sample analysis reports for soil samples collected at OW541 and OW560 indicate that limits of quantitation (LOQs) and limits of detection (LODs) exceed the NMED residential soil screening level (SSL) for thallium (7.82E-01 mg/kg) at various sample locations where sample data was reported as less than the detection limit or limit of detection (<DL/LOD). Analysis DLs also exceeded the residential SSL for thallium at sample locations OW560-BH-4 and OW560-BH-5 at various depth intervals where the sample results were reported as <DL/LOD. All thallium detections were reported as estimated concentrations above

the DL. For the detections, the DL did not exceed the residential SSL. As reference and clarification, CAFB 2018 Corrective Action Only Hazardous Waste Permit (Permit) Part 4, Investigation and Sampling Methods and Procedures, Section 4.5, Chemical Analyses, states, "the detection and reporting limits for each method shall be less than applicable background, screening, and regulatory cleanup levels. The preferred method reporting (practical quantitation) limits are a maximum of 20 percent of the cleanup, screening, or background levels. Analysis conducted with detection limits that are greater than applicable background, screening, and regulatory cleanup levels shall be considered data quality exceptions and the reasons for the elevated detection limits shall be reported to NMED." Although adequate lines of evidence have been provided to support the conclusion that thallium detected in soil at OW541 and OW560 is not associated with a characteristic release of contaminants from the oil water separators and piping and that risk and hazard for human health and the environment is acceptable based on the uncertainty analysis, the Report must also address the reporting and detection limit exceedance of the residential SSL for thallium as an additional investigation uncertainty in the appropriate sections of the Report (e.g., Sections 7.3.2.2 and 7.4.3.2). Any data identified as data quality exceptions must either be highlighted and/or footnoted as such on Report data tables and figures. Revise the Report accordingly and provide respective replacement pages, tables, and figures.

- b. The Permittee stated, "[b]ased on the RFA investigation and risk evaluation presented, Sites OW541 and OW560 are proposed for CAC [corrective action complete] without controls and to be moved from the CAFB [Cannon Air Force Base] RCRA Permit Table 1, Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) Requiring Corrective Action, to Permit Table 3, List of SWMUs and AOCs With Corrective Action Complete Without Controls Status." Site OW541 and OW560 are not listed on the 2018 Cannon Air Force Base Corrective Action Only Hazardous Waste Permit (Permit). Based on the results of investigation documented in the Report and following additional review during future class three Permit modifications, OW541 and OW560 will be listed on the appropriate Permit corrective action status tables in accordance with NMED's December 12, 2014 *RFA for AOCs OW-C560 Two Newly Identified Oil Water Separators* correspondence. No action is required by the Permittee to initiate listing of sites OW541 and OW560 on the Permit. The Permittee's statement must be revised to reflect that sites OW541 and OW560 are not currently listed on the Permit and that they will be appropriately reviewed and listed on the Permit during future class three Permit modifications. Revise the statement accordingly and provide a respective Report replacement page.

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The Permittee must provide replacement pages that address NMED's modifications. In addition, a response letter that cross-references where each of the modifications were addressed must be provided. The response letter must also be provided as an electronic copy. Electronic copies of the redline-strikeout version of the Report and the revised Report must be submitted to NMED no later than **August 31, 2021**.

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) 690-5760.

Sincerely,

**Ricardo Maestas**

Digitally signed by Ricardo  
Maestas  
Date: 2021.06.24 16:53:04 -06'00'

Ricardo Maestas  
Acting Chief  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
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