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**ENTERED**  
JAMES C. KENNEY  
CABINET SECRETARY

## Certified Mail - Return Receipt Requested

February 14, 2022

Colonel Terence G. Taylor  
Commander, 27th Special Operations Wing  
100 Air Commando Way, Suite 100  
Cannon Air Force Base  
New Mexico 88103-5214

**RE: APPROVAL WITH MODIFICATIONS  
SUPPLEMENTAL RCRA FACILITY INVESTIGATION REPORT AT FT008 - REVISION 1  
CANNON AIR FORCE BASE, NEW MEXICO  
EPA ID #NM7572124454  
HWB-CAFB-17-008**

Dear Colonel Taylor:

The New Mexico Environment Department (NMED) has received the Cannon Air Force Base (Permittee) *Supplemental RCRA Facility Investigation Report at FT008 [Solid Waste Management Unit (SWMU) 107]-Revision 1* (Report), dated June 25, 2019. NMED has reviewed the Report and hereby issues this Approval with the following modifications.

### **MODIFICATIONS**

#### **1. Section 5.1, Boring Logs, Page 5-1**

**Permittee Statement:** "Geologic materials logged at the site consisted of native materials derived from or included in Ogallala Formation at all soil boring location[s] except C107-SB03, where fill material was observed in the subsurface from 0 to 30 feet bgs [below ground surface]."

**NMED Comment:** The statement is not consistent with information provided in Section 2.3.7, FT008 Soil Remediation Report, which indicates that the 2013 site remediation excavation did not exceed 24 feet bgs. Figure 5-3 also indicates that fill materials were only identified at C107-SB03 at depths no greater than 5 feet bgs. Resolve the discrepancy and provide replacement pages for this and any other affected sections of the revised Report.

SCIENCE | INNOVATION | COLLABORATION | COMPLIANCE

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

**2. Section 5.4.3, Comparison of Site Data to Screening Criteria, Page 5-6**

**NMED Comment:** A discrepancy was noted for the maximum arsenic concentration reported in the section discussion (1.70E+00 mg/kg [milligrams per kilogram]) for the 0 to 1 foot bgs sample interval. Tables E-2 and E-7 indicate the maximum arsenic concentration is 1.70E+01 mg/kg for the interval. Resolve the discrepancy and provide a replacement page for the revised Report.

**3. Section 6.1.8, PFAS Site Investigation, Page 6-4**

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

- a. The August 2018 *Final Site Inspection of Aqueous Film Forming Foam (AFFF) Release Areas Environmental Programs Worldwide* (Site Inspection Report) discussed in the Report was not a comprehensive investigation of the release of per-and polyfluorinated alkyl substance (PFAS) contaminants of concern (COCs) at SWMU 107. Soil sampling was only conducted at two soil borings outside of the areas where characteristic contamination attributable to fire training exercises have been identified. The June 2021 *Draft Aqueous Film Forming Foam Release Areas Phase I Remedial Investigation Work Plan*, disapproved by NMED on December 15, 2021, also did not address this data gap issue. While the scope of work in the NMED-Approved April 2016 *Supplemental RCRA Facility Investigation Work Plan* did not address the release of PFAS at SWMU 107, comprehensive investigation of these contaminants is required because PFAS meets the statutory definition for hazardous waste as defined in New Mexico Hazardous Waste Act Section 74-4-3.K, Section 1004(5) of the Solid Waste Disposal Act, and Section 6903(5) of the Resource Conservation and Recovery Act and has been defined as such in the December 2018 *Cannon Air Force Base Hazardous Waste Permit* (Permit) as required by 40 Code of Federal Regulation 270.32(b)(2) for protection of human health and the environment. No changes to the Report are required in response to this comment; however, NMED will require that the release of PFAS contamination at SWMU 107 be comprehensively investigated and characterized during future investigations at the site as required by the Permit.
- b. Any investigation initiated by the Permittee without a NMED-approved work plan is conducted at risk, and it is likely that NMED will require different and/or additional work beyond work conducted under an unapproved work plan. In the absence of complete site investigation and assessment required by the CAFB Permit, SWMU 107 will not be eligible for a corrective action status review and will remain on Permit Table 1, List of Solid Waste Management Units (SWMUs) and Areas of

Colonel Taylor  
February 14, 2022  
Page 3

Concern (AOCs) Requiring Corrective Action, until the site is adequately evaluated to the satisfaction of NMED. No revisions to the Report are required in response to this comment.

- c. Revise the Report to list the Site Inspection Report in Section 7, References, and provide respective replacement pages.

The Permittee must provide replacement pages that address NMED's modifications. In addition, a response letter that cross-references NMED's numbered comments and where each of the modifications were addressed in the Report 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 **April 29, 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.

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

Sincerely,

**Rick Shean**

Digitally signed by Rick  
Shean  
Date: 2022.02.14 12:40:08  
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Rick Shean  
Chief  
Hazardous Waste Bureau

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