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Certified Mail - Return Receipt Requested

April 5, 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: ADMINISTRATIVE COMPLETENESS DETERMINATION
CORRECTIVE ACTION COMPLETE WITHOUT CONTROLS PROPOSAL
FOR POL YARD REFUELING AREA SITE (SS507) (AOC U, V, W, X, Y, Z, AA, AND BB)
CANNON AIR FORCE BASE, NEW MEXICO
EPA ID #NM7572124454
HWB-CAFB-MISC**

Dear Colonel Taylor:

The New Mexico Environment Department (NMED) has received the Cannon Air Force Base (Permittee) *Corrective Action Complete Without Controls Proposal for POL Yard Refueling Area Site (SS507) (AOC [Area of Concern] U, V, W, X, Y, Z, AA, and BB)* (Proposal) dated October 22, 2021. NMED has determined that the Proposal is administratively incomplete.

Further review of site history information associated with former Cannon Air Force Base (CAFB) SS507-Petroleum, Oil, and Lubricants Refueling Yard (Former POL Refueling Yard) and the associated AOCs proposed for corrective action status review indicate that the Proposal only addresses investigations conducted within the boundaries of the Former POL Refueling Yard. The Proposal does not include relevant information pertaining to site histories, locations, prior investigations, or prior permit modifications for AOCs U, V, W, X, Y, Z, AA, and BB that are currently listed on Table 2, List of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) with Corrective Action Complete with Controls, of the December 2018 *Cannon Air Force Base Resource Conservation and Recovery Act Permit* (Permit).

NMED has also identified an issue with the site description in Proposal Section 4.3.2, RFA [RCRA Facility Assessment] at Eight Sites, where the Permittee states that “[s]ubsequent to the completion of the RFA report, it was determined by Cannon AFB [Air Force Base] personnel that site SS507 is comprised of a series of AOCs that are listed on Table 2 of the current Cannon AFB RCRA permit as AOCs U, V, W, X, Y, Z, AA, and BB.” NMED has determined that the Former POL

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Refueling Yard and the AOCs are separate sites. Information reported in the July 1987 *Preliminary Review/VSI Report RCRA Facility Assessment* specifies that gasoline was stored in AOC U-POL Tank No. 378, a 25,000-gallon storage tank and AOC V-POL Storage Tank No. 392a, a 500-gallon storage tank. AOC W-POL Storage Tank 392b, AOC X-POL Storage Tank 392c, and AOC Y-POL Storage Tank 392d are each identified as 500-gallon storage tanks for jet fuel. AOC Z-POL Storage Tank 394 (420,000-gallons), AOC AA-POL Storage Tank 395 (840,000-gallons), and AOC BB-POL Storage Tank 396 (840,000-gallons) are jet fuel storage tanks.

The historical information also appears to indicate that AOCs U, V, W, X, Y, Z, AA, and BB are not located within the boundaries of the Former POL Refueling Yard that was subject to prior investigations and assessment as discussed in the Proposal. This appears to be confirmed in Proposal Section 4.2, History, where the Permittee states “[n]o fuels were stored in the former POL Refueling Yard area.” However, additional information is required to substantiate the Permittee’s statement.

Current information documented in the April 12, 2021, *Operational POL-Liquid Fuel Dispensing System Map for Cannon Air Force Base (CAFB)* only confirms that AOCs Z, AA, and BB are located at the bulk fuel storage area adjacent to the Former POL Refueling Yard and continue to be used as jet fuel storage tanks for CAFB facility operations and will likely require separate investigations following any future decommissioning of the tanks. In addition, the Proposal does not include any information to support a corrective action status review for AOCs U, V, W, X and Y.

Former POL Refueling Yard site information provided in the April 2012 *Site Investigation at Eight Sites Project Activities Work Plan* indicates that two approximately 400-gallon jet fuel (JP-8) spills are known to have occurred at the yard, and the locations are depicted on Proposal Figure 4-4 at southwestern and eastern portions of the site. NMED has identified an additional concern with the potential use of aqueous film forming foam (AFFF) containing per- and polyfluorinated alkyl substances (PFAS) at the Former POL Refueling Yard spill sites as an emergency measure to prevent ignition of the fuel at the time of release. The use of AFFF at CAFB during fuel spill emergency responses was addressed in the July 2017 *Installation Specific Work Plan Cannon Air Force Base, New Mexico, Site Inspection of Aqueous Film Forming Foam (AFFF) Release Areas Environmental Programs Worldwide*, Section 1.1, Per- and Polyfluorinated Alkyl Substances Overview discussion. Therefore, additional information and investigation at the Former POL Refueling Yard jet fuel spill sites to address potential PFAS releases is required. PFAS investigations at CAFB are required by the Permit because PFAS meet the statutory definition for hazardous waste 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 is defined as such in the Permit as required by 40 Code of Federal Regulations 270.32(b)(2) for protection of human health and the environment.

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Based on the issues identified in this letter, NMED has determined that the Proposal does not present complete information and data necessary to qualify for a change in status for SS507 Former POL Refueling Yard and AOCs U, V, W, X, Y, Z, AA, and BB; therefore, the sites are not currently eligible for the proposed corrective action status review.

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: 2022.04.05 09:56:05 -06'00'

Rick Shean
Chief
Hazardous Waste Bureau

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