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Certified Mail - Return Receipt Requested

August 8, 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
ACCELERATED CORRECTIVE MEASURES COMPLETION REPORT SITE SW127
CANNON AIR FORCE BASE, NEW MEXICO
EPA ID #NM7572124454
HWB-CAFB-17-010**

Dear Colonel Taylor:

The New Mexico Environment Department (NMED) has received the Cannon Air Force Base (Permittee) *Accelerated Corrective Measures Completion Report Site SW127 [Solid Waste Management Unit (SWMU) 127]* (Report), dated April 17, 2020. NMED has reviewed the Report and hereby issues this Approval with the following modifications.

MODIFICATIONS

1. Section 3.2.1.1, Small Excavation Located at Soil Boring SB13, Page 3-3

Permittee Statement: "An inch and a half Polyvinyl chloride (PVC) pipe was uncovered in the excavation, running west to east (See Photograph No. 5 and 6 in Appendix D)."

NMED Comment: Appendix D Photograph No. 6 also depicts a steel pipe located adjacent to the PVC pipe at the location of the SB13 excavation. Provide additional information on the steel pipe uncovered during the excavation in the revised Report and provide respective replacement pages.

2. Section 4.4.5, Evaluation of Lead, Page 4-11

Permittee Statement: "Lead concentrations were determined to exceed background levels. However, the maximum detected concentration of lead (2.08E+01E+01 [sic] mg/kg

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[milligrams per kilogram]) did not exceed the residential SSL of 4.00E+02 mg/kg nor the site worker SSL of 8.00E+02 mg/kg.”

NMED Comment: Revise the statement to correct the typo affecting the reported maximum detected concentration for lead and provide a revised replacement page.

3. Section 5.1, Conclusions, Pages 5-1 and 5-2

NMED Comment: The following comments must be addressed:

- a. The Permittee stated that, with respect to the refined human health risk screen evaluation for soil, “[t]he risk assessment concluded that based on 95% UCL [upper confidence level], soils at SW127 are unlikely to pose unacceptable cancer risks or adverse health effects to current and potential future receptors.” However, Section 4.4.7, Refined Quantitative Risk Screen Evaluation for Soil, concluded that the refined residential cancer risk (2E-05) exceeded NMED’s target cancer risk 1E-05 and may pose unacceptable risk for residential exposure. To clarify, and as addressed in Section 4.4.7 for hazard index exceedances, a target organ assessment only applies to evaluation of non-cancer health-effects. Revise the Report to resolve the risk assessment conclusion discrepancy and provide respective replacement pages.
- b. Regarding the cumulative cancer risk for residents and site workers, the Permittee stated that, “[t]he cumulative risks for both receptors did not exceed the NMED target of 1E-05.” However, Section 4.4.9, Cumulative SW127 Risk and Hazards, concluded that soils within the exposure interval for residents may result in unacceptable cancer risk. Section 5.1 must be revised to accurately discuss the results of cumulative cancer risk for residents. Resolve the discrepancy in the revised Report and provide revised replacement pages.

4. Section 5.3, Recommendations, Pages 5-2 and 5-3

NMED Comment: The following comments must be addressed:

- a. The Permittee stated that “the risk assessment completed utilizing all current and historical data indicated cumulative risks did not exceed the NMED cancer risk of 1E-05 or the noncancer hazard index of 1.0.” However, the statement is not consistent with the risk screen evaluation conclusions in Sections 4.4.7 and 4.4.9 for residential exposure, which exceeds NMED’s cancer-risk criteria. Furthermore, sampling at the location of the former oil water separator is still required. Resolve the risk screen evaluation conclusion discrepancy in the revised Report and provide revised replacement pages.

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- b. In addition to the proposed reconnaissance of the building at SWMU 127 depicted on the site drawing titled "Closed Loop Washrack" included in Appendix H, GPR [Ground Penetrating Radar] Survey Maps, the location of the washrack drain and return pipe conduit noted between the depicted "RFG Unit" located at the building and a washrack sump, as well as the steel pipe conduit connecting the washrack sump to the wash pad, must be identified. Additional sampling and chemical analysis along the pipe conduits and at the sump also appear warranted at this time. Revise the Report to specify these additional requirements and provide revised replacement pages.

5. Figure 3-2, Confirmation Sampling Locations

NMED Comment: Revise Figure 3-2 to indicate that all excavation samples were evaluated with NMED's 2019 soil screening levels as specified in the Report narrative and provide a revised replacement figure.

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 **November 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.

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: 2022.08.08
13:58:08 -06'00'

Rick Shean
Chief
Hazardous Waste Bureau

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