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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: DISAPPROVAL
SWMU 127 WORK PLAN RCRA FACILITY ASSESSMENT
CANNON AIR FORCE BASE, NEW MEXICO
EPA ID #NM7572124454
HWB-CAFB-20-002**

Dear Colonel Taylor:

The New Mexico Environment Department (NMED) has received the Cannon Air Force Base (Permittee) *SWMU [Solid Waste Management Unit] 127 Work Plan RCRA Facility Assessment* (Work Plan), dated May 20, 2020. NMED has reviewed the Work Plan and hereby issues this Disapproval. The following comments must be addressed.

COMMENTS

1. Section 1.2, Purpose and Scope, Page 1-1

NMED Comment: The following comments must be addressed:

- a. The June 2022 NMED *Risk Assessment Guidance for Site Investigations and Remediation* (RA Guidance) is the most current guidance document and is updated regularly. Revise the Work Plan to propose evaluation of the site with the most current RA Guidance at the point the scope of work is completed.
- b. Based on the data gap associated with the pending required characterization of site conditions at the former oil water separator and other identified washrack components, the Work Plan must be revised to propose risk screen evaluation for the additional proposed site characterization data and to specify all proposed methods and procedures to be used in the evaluation. The revised Work Plan must also specify how the results will be combined with site risk and hazard determined in

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the April 2020 *Accelerated Corrective Measures Completion Report Site SW127* (April 2020 ACMCR) to ensure a comprehensive evaluation of the site. The Work Plan must be revised accordingly.

2. Section 2.1.1, Site Description and Conditions, Page 2-1

Permittee Statement: "SWMU 127 is a relatively level, undeveloped parcel of land with vegetation consisting of native grasses."

NMED Comment: The statement is inaccurate. The site was developed as a fuel truck washrack. A wash pad, a sand trap, an oil water separator, leach fields, and other washrack components were identified in association with this site development. The site was also subject to corrective action (i.e., soil excavation), as documented in the April 2020 ACMCR. The Work Plan must be revised to accurately describe site development, use, and conditions.

3. Section 2.2, RFA Objectives, Pages 2-2 and 2-3

NMED Comment: The following comments must be addressed:

- a. In addition to the proposed reconnaissance of the building at SWMU 127 that is depicted on the site drawing titled "Closed Loop Washrack" included in April 2020 ACMCR, Appendix H, GPR [Ground Penetrating Radar] Survey Maps, the location of the washrack drain and return pipe conduit noted on the site drawing 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 appears warranted and must be proposed in the revised Work Plan. Revise the Work Plan accordingly.
- b. The Work Plan must propose at least four contingency step-out borings for sample collection to delineate the extents of any contamination encountered above applicable regulatory screening levels at the confirmed location of the former oil water separator. The Work Plan must be revised accordingly.

4. Section 3.4.3, Surface Soil Analytical Sample Collection, Page 3-2

Permittee Statement: "Based on the contaminants identified by prior investigations, site specific analytical parameters will be selected from the following: VOCs [volatile organic compounds], SVOCs [semi-volatile organic compounds], TAL [total analyte list] metals, TPH [total petroleum hydrocarbon]-DRO [diesel range organics], and/or TPH-ORO [oil range organics]."

NMED Comment: For consistency with the proposed sample analysis work scope for TPH specified in Section 2.2 and Table 2-1, Summary of Soil Samples Proposed for Chemical Analysis, all surface soil samples collected for TPH analysis must be analyzed for DRO, ORO, and gasoline range organics (GRO) in addition to the proposed analyses for VOCs, SVOCs, and TAL metals. The Permittee's statement must be revised to specify this requirement.

5. Section 3.5.3, Subsurface Soil Analytical Sample Collection, Page 3-4

NMED Comment: The following comments must be addressed:

- a. As proposed on Table 2-1, United States Environmental Protection Agency Method 8270D with Selected Ion Monitoring (SIM) must be proposed for use for analysis of polynuclear aromatic hydrocarbons (PAHs) in subsurface soil. Revise the section discussion to also specify this requirement.
- b. For consistency with the sample analysis work scope proposed in Section 2.2 and Table 2-1, all subsurface soil samples collected for TPH analysis must be analyzed for GRO, DRO, and ORO in addition to the proposed analyses for VOCs, SVOCs, and TAL metals. The section discussion must be revised to consistently specify this requirement.

6. Appendix B, Analytical Laboratory Information, Pages B.1-1 through B.2-3

NMED Comment: Reference to the Quality Assurance Project Plan (QAPP) must be removed from all Appendix B tables, and the tables revised to reference the scope of work proposed in the Work Plan. Appendix B must be revised accordingly.

The Permittee must submit a revised Work Plan that addresses all comments contained in this Disapproval. In addition, the Permittee must include a response letter that cross-references where NMED's numbered comments were addressed. The Permittee must also submit an electronic redline-strikeout version of the revised Work Plan showing where all changes to the Work Plan have been made. The revised Work Plan must be submitted to NMED no later than **December 30, 2022**.

Colonel Taylor
August 8, 2022
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If you have any questions regarding this letter, please contact Gabriel Acevedo at (505) 690-5760.

Sincerely,

Rick Shean

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Date: 2022.08.08
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Rick Shean
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
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