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Certified Mail - Return Receipt Requested

January 30, 2023

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
WORK PLAN RCRA FACILITY INVESTIGATION SITE AT134 - REVISION 1
CANNON AIR FORCE BASE, NEW MEXICO
EPA ID #NM7572124454
HWB-CAFB-20-005**

Dear Colonel Taylor:

The New Mexico Environment Department (NMED) is in receipt of the Cannon Air Force Base (Permittee) *Work Plan RCRA Facility Investigation Site AT134 - Revision 1* (Work Plan) dated September 26, 2022. NMED hereby issues this Approval with the following modifications.

MODIFICATIONS

1. Section 2.2, Site AT134, Page 2

Permittee Statement: "Solid Waste Unit TA129 and Waste Storage Facility 244 are located south of the investigation area. TA129 and associated Waste Storage Facility 244 was investigation [sic] in 2016. Based on the results of the investigation and risk assessment TA 129 and associated Waste Storage Facility 244 was recommended for corrective action complete."

NMED Comment: As listed in December 2018 *Cannon Air Force Base RCRA Hazardous Waste Permit* (Permit), Table 1, List of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) Requiring Corrective Action, the appropriate name for the site to the south addressed as TA129 in the statement is Solid Waste Management Unit (SWMU) 129, Waste Storage Facility 244. The Permittee's statement must be revised to accurately cite SWMU 129 as the site to the south. Provide a replacement page with the revised statement.

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

2. Section 5.4.1, Field Screening, Page 13

Permittee Statement: “Field screening will also be used for horizontal delineation during field investigations. If staining or PID [photoionization detector] headspace readings above 10 ppm [parts per million] are observed in soil borings along the site perimeter, additional soil borings will be advanced 10 feet away in up to four directions from the original soil boring location. Step-out borings will be advanced to 10 feet bgs [below ground surface] unless vertical delineation is required.”

NMED Comment: PID readings and other proposed field screening information are considered qualitative data and can only be used as supporting evidence for the collection of samples for laboratory chemical analysis where contamination is suspected. PID readings can only be used for screening for the potential presence of volatile organic compounds and will not serve to identify other contaminants of concern identified in the Work Plan. Field screening alone at step-out locations cannot serve as evidence of delineation of the contamination identified at the site. If contamination is identified by field screening at a boring location, a soil sample from the corresponding interval must be collected and analyzed by a laboratory for appropriate site characterization.

Step-out borings and collection of respective soil samples for chemical analysis are typically only required if soil analytical data exceed screening levels for contaminants of concern at a boring location and if the horizontal extent of contamination has not been delineated by analytical data collected at surrounding boring locations. The Permittee may choose to advance step-out borings based on field screening at risk, but field screening alone cannot be used to determine the absence of contamination or compliance with cleanup levels. Step-out borings for horizontal delineation must be proposed within 10 feet of the original boring location as previously clarified in NMED’s May 18, 2022 *Disapproval Work Plan RCRA Facility Investigation Site AT134* (May 2022 Disapproval) Comment 3.

In general, if it is determined that step-out borings are necessary to confirm horizontal delineation, they must be proposed in the investigation report recommendations section with supporting information. If NMED concurs, the full scope of work must be proposed in a work plan addendum along with any other follow-on work deemed necessary to complete the site assessment. Revise Section 5.4.1, Figure 4-1, and any other affected sections of the Work Plan to correct this issue and to include the other requirements specified in this comment. Provide replacement pages for the revisions.

3. Section 5.5, Vapor Intrusion Monitoring, Pages 13 and 14

Permittee Statement: “Currently, there are no buildings at the Site, nor are there any planned buildings for this location.”

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The Permittee must provide replacement pages that address NMED's required modifications to the Work Plan. 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 revised Work Plan and the redline-strikeout version of the Work Plan must be submitted to NMED no later than **March 31, 2023**.

The investigation report documenting the site investigation and risk assessment must be submitted no later than **November 30, 2023**.

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: 2023.01.30
06:19:40 -07'00'

Rick Shean
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
B. Wear, NMED HWB
G. Acevedo, NMED HWB
L. King, EPA Region 6 (6LCRRC)
C. Gierke, CAFB
C. Soto-Lorenzo, CAFB
J. Burgoon, CAFB

File: CAFB 2023 and Reading

NMED Comment: Figure 2-4: Site AT134 Sample Locations, depicts buildings in the central and southern portions of the expanded project area defined as the “Preliminary Site Investigation Area” where tar seeps are mapped, and soil sampling is proposed. Resolve the discrepancy and provide a replacement page.

4. Section 5.13.1, Risk Assessment Report, Pages 21 and 22

NMED Comment: NMED’s November 2022 *Risk Assessment Guidance for Site Investigations and Remediation* (RA Guidance) is the latest risk assessment guidance document issued by NMED. No changes to the Work Plan are required in response to this comment; however, the proposed risk assessment and site evaluation must be conducted in accordance with NMED’s most current RA Guidance document.

5. Attachment 1: Figures, Figure 4-1, Decision Logic, Page 6

NMED Comment: The following issues must be addressed:

- a. Revise the figure to indicate that step-out borings for horizontal delineation must be advanced within 10-feet of the original boring and provide a revised replacement figure.
- b. As required by NMED’s May 2022 Disapproval Comment 5a, remove the reference to the caliche caprock layer from Figure 4-1. Impermeable caprock does not exist at Cannon Air Force Base. Revise the figure and provide a replacement.

6. Attachment 2: Tables, Table 5-1, Proposed Samples, Pages 1 through 4

NMED Comment: Revise Table 5-1 to include the required sampling for total petroleum hydrocarbon diesel-range and oil-range organics for all proposed borings and sampling intervals as proposed in Section 5.10, Sample Analysis, and provide a revised replacement table.

7. Attachment 2: Tables, Table 5-4, Project Action Limits and Laboratory-Specific Detection/Quantitation Limits-TAL Metals, Page 9

NMED Comment: The laboratory project quantitation limit goal for thallium is greater than the listed screening level for residential exposure. However, based on the site history, thallium does not appear to be a potential site contaminant. A discussion of uncertainties associated with thallium data will be required with the investigation report and risk assessment. No revisions to the Work Plan are required in response to this comment.