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JON GOLDSTEIN
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 11, 2010

Colonel Stephen Clark
27th Special Operations Wing
100 South D.L. Ingram Boulevard
Cannon Air Force Base, New Mexico 88103-5214

**RE: NOTICE OF DISAPPROVAL
DRAFT WORK PLAN
GROUNDWATER MONITORING
MELROSE AIR FORCE RANGE, NEW MEXICO, OCTOBER 2009
EPA ID NO. NM7572124454
HWB-MELR-09-002**

Dear Col. Clark:

The New Mexico Environment Department (NMED) has received the U.S. Department of the Air Force, Cannon Air Force Base's (Permittee) *Draft Work Plan, Annual Groundwater Monitoring, Melrose Air Force Range, October 2009* (Draft Work Plan). NMED has reviewed the Draft Work Plan and hereby issues this Notice of Disapproval (NOD) and provides the following comments.

NMED reminds the Permittee that it does not review draft documents and considers this submittal to be a final document. In the future, NMED will reject draft documents pursuant to 20.4.2.201.B(4) NMAC.

Comment 1. Section 1.0, General Work Plan, Page 1-1:

Areas of Concern (AOCs) 1, 2, 3 and 4 should no longer be identified as AOCs. The Permittee is referred to NMED's Annual Unit Audit dated June 30, 2005, and subsequent assessments. In Table B attached to Invoice # HWB-MELR-AUA-2004, the former AOCs 1, 2, 3 and 4 are identified as Corrective Action Units 130, 131, 132, and 133, respectively. The Permittee must identify these sites as Solid Waste Management Units (SWMUs) 130, 131, 132 and 133, respectively, in future documents and publications. The Permittee may add the qualifier 'former AOC-n' if it is necessary to avoid confusion.

The Permittee states that monitoring wells are associated with three SWMUs and four AOCs, and then identifies only two SWMUs and three AOCs. The itemized list is correct. There are no monitoring wells associated with SWMU 115 or the AOC 4 (SWMU 133). The Permittee must revise the statement to correct the discrepancy.

Comment 2. Purpose and Scope, Page 1-1:

The Permittee proposes semi-annual sampling of groundwater monitoring wells associated with SWMUs 114 and 117 and AOCs 1, 2 and 3, and annual sampling of groundwater in wells in the water quality monitoring well network. However, among the program recommendations described in the Permittee's *Initial Baseline Groundwater Monitoring, Melrose Air Force Range, June 2009* the Permittee proposed annual sampling of monitoring wells and the water quality well network. NMED concurs with the proposed frequency of sampling described in the Draft Work Plan. The Permittee must conduct sampling of groundwater monitoring wells semi-annually.

Comment 3. Section 2.1.2, Decision Statement, Pages 2-1 and 2-2 and Tables 3-7, 3-8, 3-9, and 3-10:

Where groundwater screening levels are not listed in Water Quality Control Commission (WQCC) regulations at 20.6.2.3103 NMAC, the Permittee has listed screening levels for tapwater published in the U.S. Environmental Protection Agency *Regional Screening Levels for Chemical Contaminants at Superfund Sites* (RSLs). The WQCC groundwater standards, including any approved alternative abatement standards (20.6.2.7.WW and 20.6.2.3103 NMAC), and the drinking water maximum contaminant levels (MCLs) adopted by EPA under the federal Safe Drinking Water Act (42 U.S.C. §§ 300f to 300j-26), are cleanup levels for groundwater. If both a WQCC standard and an MCL have been established for an individual substance, then the lower of the two levels must be used as the cleanup level for that substance. If no WQCC groundwater standard or MCL has been established for a substance, then a screening level for tapwater published in the NMED *Technical Background Document for Development of Soil Screening Levels, Revision 5.0* (NMED SSLs) is the appropriate value. A RSL value is appropriate when no WQCC, MCL, or NMED SSL value for tapwater is available. For

carcinogens, the Permittee must multiply RSL values by a factor of 10 to obtain a screening value based on an excess cancer risk of 10^{-5} . The Permittee must revise the guideline hierarchy in Section 2.1.2 and Tables 3-7, 3-8, 3-9 and 3-10 to reflect appropriate screening levels.

Comment 4. Section 1.2, Purpose and Scope, Page 1-1 and Section 2.0, Field Sampling Plan, Pages 2-1 and 2-2 and Section 2.1.5, Decision Rule, Page 2-2:

The Permittee indicates that analytical results of groundwater sampling will be used to determine if any of the sites being investigated can be selected for Corrective Action Complete (CAC) status, or if further investigation or monitoring is required. The Permittee is referred to the Department of the Air Force's letter dated May 9, 2007 requesting deferral of a RCRA Facility Investigation (RFI) Work Plan prepared for Melrose Air Force Range (MAFR) because the entire facility is an active range. The Department of the Air Force stated that Cannon Air Force Base (CAFB) will maintain and monitor all areas of SWMUs and AOCs at the range in accordance with range's Hazardous Waste Permit. NMED's letter dated June 19, 2007 approved deferment for the submittal of a revised RFI Work Plan. The Permittee must modify the purpose and scope of the Work Plan to indicate that, as an interim measure until the SWMUs are fully investigated, groundwater will continue to be monitored for the presence of potential contaminants.

Comment 5. Tables 2-1 and 2-2, Quality Well Network and SWMU Monitoring Wells Proposed Sampling Locations and Parameters and Section 3.22, Laboratory Analytical Methods, Page 3-14 and 3-15:

The Permittee listed wells to be included in the Groundwater Quality Well Network and SWMU groundwater monitoring wells. The Permittee is referred to Comments 5, 6 and 7 in NMED's letter dated October 27, 2009 regarding NMED's review of *Initial Baseline Groundwater Monitoring, Melrose Air Force Range, June 2009*. Those comments provide instructions on well abandonment, well installations, as well as inclusion and exclusion of wells in the monitoring well network.

The Permittee proposed analytical suites for the groundwater samples. NMED concurs with the proposed chemical analytical methods with the following modifications. The Permittee must analyze for both total and dissolved RCRA metals and replace EPA Method 6010B with the updated 6010C for metals analyses. The Permittee must include total and dissolved target analyte list (TAL) metals (aluminum, antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, copper, iron, lead, manganese, mercury, nickel, potassium, selenium, silver, sodium, thallium, vanadium zinc and cyanide) in the year 2010 and every sixth year thereafter (i.e., 2016, 2022 and so on). The Permittee must add perchlorate by EPA Method 6850 or 6860 and nitrate plus nitrite by EPA Method 9056 to the analytical suite for the samples to be collected annually.

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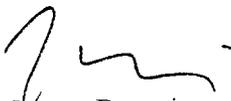
Comment 6:

NMED notes that the Draft Work Plan was used by the Permittee to conduct sampling in 2009 that was reported in *Initial Baseline Groundwater Monitoring, June 2009*. An approved Work Plan must be used for all groundwater sampling events.

The Permittee must address all comments in this NOD and submit a response by March 15, 2010. All submittals must be in the form of two paper copies and one electronic copy. The Permittee must also provide an electronic red-line strike out version of the revised Work Plan that shows all revisions made to the Work Plan.

If you have any questions regarding this letter, please call Pat Stewart at (505) 476-6059.

Sincerely,



James Bearzi
Chief
Hazardous Waste Bureau

cc: J. Kieling, NMED HWB
D. Cobrain, NMED HWB
N. Dhawan, NMED HWB
P. Stewart, NMED HWB
R. Lancaster, CAFB
H. Hanson, CAFB
File: MELR 2010 and Reading
MELR-09-001