



SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT



2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.env.nm.gov

RYAN FLYNN
Secretary
BUTCH TONGATE
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 2, 2015

Colonel Douglas W. Gilpin
Commander, 27th Special Operations
Mission Support Group
110 E. Alison Avenue, Suite 1098
Cannon Air Force Base

**RE: APPROVAL WITH DIRECTION
SWMU 111/112 STATUS REPORT
CANNON AIR FORCE BASE, NEW MEXICO
NM7572124454
HWB-CAFB-15-003**

Dear Colonel Gilpin:

The New Mexico Environment Department (NMED) has received Cannon Air Force Base's (Permittee) *SWMU 111/112 Status Report* (Report), dated June 25, 2015 and received June 26, 2015. NMED has completed review and hereby approves the Report with the following comments.

Comments:

NMED Comment No. 1: The electronic copy of any submitted report must include a copy of the report text in Microsoft Word format and the data tables in Excel format. Given that this report is of a significantly smaller volume than most submittals, this was not a hindrance during review. However, it should be noted that these reporting requirements must be met for all future submittals.

Additionally, boring logs must be submitted as a formatted official record of drilling activities. Submittal of hand written field logs does not meet this standard. Also, a numerical value must be provided with all reported field screening head space analysis data for future drilling log

submittals.

NMED Comment No. 2: A review of historical report information indicates sampling of the former unlined pit (SWMU 111) and oil water separator (OWS) No. 2336 (SWMU 112) associated with Fire Training Area No. 4 was conducted during the 1997 *RCRA Facilities Investigation* by Harza Environmental Services which reported a total petroleum hydrocarbon (TPH) concentration of 1,040 milligrams per kilogram (mg/kg) at boring location SB14 for the one-foot below ground surface (bgs) sample interval. The reported concentration exceeded the NMED TPH residential soil screening level (SSL) of 1,000 mg/kg. No other TPH SSL exceedances were reported for the remaining samples collected at 2 and 15 feet bgs, respectively. Subsequently, a resampling event was conducted in association with the *Phase I Investigation Soil Corrective Measures Fire Training Area 04* by TN & Associates, Inc. which included the resampling of SB14 in 2004. The investigation findings for SWMU 111/112 indicated TPH concentrations were below laboratory reporting levels for the two samples collected at the 0 to 1 foot and 9 to 10 foot bgs sample intervals. However, based on the provided sample map, the actual location of sample collection was outside (east) of the established boundary of SMWU 111/112 and was not representative of the site conditions. The current 2014 resampling event documented in the Report submitted by Cannon Air Force Base indicates that only an oil range organic (ORO) TPH concentration of 9.10 mg/kg was detected at the 19 to 20 foot bgs sample interval, which is well below the 1,000 mg/kg TPH residential SSL. TPH was not detected in the additional sample collected at the 1 to 2 foot bgs sample interval. The samples were collected within the former location of SWMU 112.

NMED Comment No. 3: In order to evaluate the validity of analytical results reported in the Walk, Haydel & Associates, *Remedial Investigation Report* completed in 1990, from analyses of soil samples obtained from boring locations B4, B5 and B9, resampling was conducted at location B9 and included with the findings for SWMU 111/112. The exceedences of arsenic reported in 1990 for the sample location and all sample intervals to the boring termination depth of 61.5 feet bgs exceeded NMED SSLs and site specific background concentrations. The highest reported concentration was 152.5 mg/kg at the 31.5 foot bgs sample interval. However, the 1990 data was deemed invalid in the findings of the *RCRA Facility Investigation for SWMUs 34, 78, 85, 91, 95 and 107 Addendum Report* completed by URS in 2009. Additional sampling conducted during field activities at SWMU 111/112 presented in the current Report found the concentrations were below the residential SSL for arsenic of 4.25 mg/kg for the resampling of B9 at the 1.5 foot bgs (4.22 mg/kg), 9 foot bgs (2.38 mg/kg), 11.5 foot bgs (3.22 mg/kg), 16.5 foot bgs (3.73 mg/kg) and 31.5 foot bgs (1.75 mg/kg) sample intervals indicating that the concentrations reported in the 1990 investigation may have been attributed to the method of analysis used.

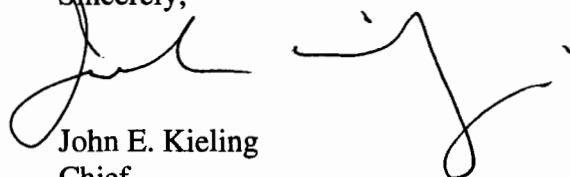
NMED concurs with the Permittee's conclusion that the above mentioned sites do not pose unacceptable risk to human health and the environment. However, if in the future any additional information becomes available that indicates that these sites may pose a risk to human health or the environment, NMED may require the Permittee to conduct corrective action at these sites. The Permittee may submit a permit modification request to change the status of Solid Waste Management Units 111/112 from Corrective Action Required to Corrective Action Complete

Colonel Gilpin
September 2, 2015
Page 3

(CAC). The request for a permit modification must be submitted in accordance with 40 CFR §270.42 (c) pertaining to Class 3 modifications.

If you have any questions regarding this letter, please contact Gabriel Acevedo at (505) 476-6043.

Sincerely,

A handwritten signature in black ink, appearing to read 'John E. Kieling', with a large, stylized flourish extending to the right.

John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
G. Acevedo, NMED HWB
B. Wear, NMED HWB
N. Dhawan, NMED HWB
B. Chavez, CAFB
R. Lancaster, CAFB
L. Peters, CAFB

File: CAFB 2015, SWMU 111/112 Status Report Approval with Direction