



DEPARTMENT OF THE AIR FORCE
27TH SPECIAL OPERATIONS CIVIL ENGINEER SQUADRON (AFSOC)
CANNON AIR FORCE BASE NEW MEXICO



31 May 18

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Mr. Gabriel Acevedo
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Hazardous Waste Bureau
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Santa Fe NM 87501



Dear Mr. Acevedo:

Cannon Air Force Base is pleased to provide the “*Record of Decision TS835 – 1940’s Skeet Range Munitions Response Site*” for Cannon AFB. This document is provided to NMED as a courtesy to keep you informed of the Military Munitions Response Program restoration activities on Cannon AFB.

Cannon AFB appreciates the valued working relationship established with you and your department. If you have further comments or questions pertaining to the referenced work plan, please contact Steven Palmer, steven.palmer@us.af.mil (575) 904-6744 or Mark Fuchs, (575) 904-6743.

Sincerely,

Steven Leonard Palmer

Attachment:

Record of Decision TS835 – 1940’s Skeet Range Munitions Response Site

AIR COMMANDOS

RECORD of DECISION

TS835 – 1940's SKEET RANGE MUNITIONS RESPONSE SITE

for

**CANNON AIR FORCE BASE
CLOVIS, NM**



**AIR FORCE CIVIL ENGINEER CENTER
2261 Hughes Ave., Suite 155
Joint Base San Antonio Lackland AFB, Texas 78236-9853**

April 2017

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TABLE OF CONTENTS

SECTION	PAGE
1.0 DECLARATION	1-1
1.1 Site Name and Location.....	1-1
1.2 Statement of Basis and Purpose.....	1-1
1.3 Assessment of the Site	1-1
1.4 Description of the Selected Remedy.....	1-1
1.5 Statutory Determinations	1-2
1.6 Data Certification Checklist.....	1-2
1.7 Authorizing Signatures	1-3
2.0 DECISION SUMMARY	2-1
2.1 Site Name, Location and Brief Description.....	2-1
2.1.1 Site History	2-1
2.1.2 Previous Investigations	2-1
2.1.2.1 Modified Comprehensive Site Evaluation Phase I	2-2
2.1.2.2 Comprehensive Site Evaluation Phase II.....	2-2
2.1.2.3 Engineering Evaluation/Cost Analysis	2-3
2.1.2.4 Non-Time Critical Removal Action.....	2-4
2.2 Community Participation.....	2-4
2.3 Scope and Role of Military Munitions Response Program	2-6
2.4 Site Characteristics	2-6
2.4.1 Topography.....	2-7
2.4.2 Soil and Vegetation.....	2-7
2.4.3 Geology and Hydrogeology.....	2-7
2.4.4 Hydrology	2-7
2.5 Current and Potential Future Land Uses.....	2-7
2.6 Summary of Site Risks	2-7
2.7 Remedial Action Objectives.....	2-8
2.8 Principal Threat Wastes	2-8
2.9 Selected Remedy.....	2-8
2.9.1 USEPA Acceptance	2-9
2.9.2 Community Acceptance.....	2-9
2.10 Documentation of Significant Changes	2-9
3.0 RESPONSIVENESS SUMMARY.....	3-1
3.1 Stakeholder Comments and Lead Agency Responses.....	3-1
3.2 Technical and Legal Issues	3-1
4.0 REFERENCES.....	4-1

LIST OF FIGURES

FIGURE

- Figure 2-1 Cannon Air Force Base Location
- Figure 2-2 TS835 – 1940’s Skeet Range MRS Boundary

LIST OF TABLES

TABLE

- Table 2-1 Public Notification of Document Availability 2-5
- Table 2-2 Public Comment Period Requirements 2-5

LIST OF APPENDICES

- Appendix A Public Notice
- Appendix B USEPA Letter of Approval

LIST OF ABBREVIATIONS AND ACRONYMS

%	percent
AFB	Air Force Base
AFCEC	Air Force Civil Engineer Center
ARAR	Applicable or Relevant and Appropriate Requirements
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CSE	Comprehensive Site Evaluation
CSM	conceptual site model
DERP	Defense Environmental Restoration Program
DoD	Department of Defense
EE/CA	Engineering Evaluation/Cost Analysis
EO	Executive Order
FPM	FPM Remediations, Inc.
ft	foot/feet
MC	Munitions Constituents
MEC	Munitions and Explosives of Concern
MMRP	Military Munitions Response Program
MRS	Munitions Response Site
MRSP	Munitions Response Site Prioritization Protocol
NCP	National Contingency Plan
NFA	No Further Action
NMED	New Mexico Environment Department
NTCRA	Non-Time-Critical Removal Action
O&M	Operations and Maintenance
PAH	polycyclic aromatic hydrocarbon
PP	Proposed Plan
RAO	Remedial Action Objectives
ROD	Record of Decision
RSL	Regional Screening Level
SARA	Superfund Amendments and Reauthorization Act
SSL	Soil Screening Level
USACE	United States Army Corps of Engineers
USAF	United States Air Force
USEPA	United States Environmental Protection Agency
UU/UE	Unlimited Use/Unrestricted Exposure
XRF	X-ray fluorescence

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1.0 DECLARATION

1.1 Site Name and Location

Site Name: TS835 – 1940’s Skeet Range Munitions Response Site (MRS)

Site Location: Cannon Air Force Base (AFB)

Clovis, New Mexico

1.2 Statement of Basis and Purpose

This Record of Decision (ROD) presents the selected remedy for the TS835 – 1940’s Skeet Range MRS, at Cannon AFB, New Mexico, which was chosen in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986, and to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). This decision is based on the MRS investigation documents contained in the Administrative Record for this site.

This document is issued by the United States Air Force (USAF), as the lead agency. The USAF is managing the remediation of this site through the Military Munitions Response Program Sites (MMRP) in accordance with CERCLA as required by the Defense Environmental Restoration Program (DERP) and Executive Order (EO) 12580.

As the lead agency, the USAF has selected the No Further Action (NFA) remedy with the United States Environmental Protection Agency (USEPA) with concurrence from the New Mexico Environment Department (NMED).

1.3 Assessment of the Site

The response action selected in this ROD is NFA, as the site has attained Unlimited Use/Unrestricted Exposure (UU/UE) clean up levels, meaning the site has met the criteria to be site complete (SC) under the MMRP.

The USAF performed a Non-Time-Critical Removal Action (NTCRA) in April and May of 2015 to remove surface and shallow subsurface polycyclic aromatic hydrocarbon (PAH) contaminated soils and the off-site disposal of those soils at an appropriate disposal facility. In doing so, the USAF has met the Remedial Action Objective (RAO) as defined in the Engineering Evaluation/ Cost Analysis (EE/CA) (FPM Remediations, Inc. [FPM], 2014) and the NTCRA After Action Report (FPM, 2015) attaining UU/UE soil cleanup levels so that NFA is an appropriate remedy and the property now can be used for all uses, including potential residential use.

1.4 Description of the Selected Remedy

Remedial alternatives for the TS835 – 1940’s Skeet Range MRS were developed and evaluated through the EE/CA completed in 2014 (FPM, 2014). As previously stated, a NTCRA was performed at the TS835 site to remove residual soil PAH contamination and achieve the RAO of meeting residential cleanup levels. Based on the aforementioned removal activities conducted at the site and the results of the post-excavation confirmation sampling, the USAF selected NFA allowing for UU/UE, as the preferred alternative for the TS835 - 1940’s Skeet Range MRS. Confirmation sampling, as documented in the NTCRA After Action Report, has confirmed that PAH concentrations in site soils are below the USEPA and NMED Soil Remediation Levels for

residential soils. Based on residual soil PAH concentrations levels, the site no longer presents a risk to human health or the environment.

1.5 Statutory Determinations

The NFA determination is protective of human health and the environment, complies with promulgated federal and state requirements that are applicable or relevant and appropriate to the remedial action, and is cost effective.

Since the NTCRA performed at the site included the removal of all surface and shallow subsurface soil contamination identified during previous investigations and the off-site disposal of those soils, but did not use treatment, the statutory preference for treatment was not attained, because it was economically and technically impracticable to do so. Having attained UU/UE cleanup levels, the NTCRA eliminated the need to conduct further remedial action for the soils. Since UU/UE cleanup levels have been attained, five-year reviews are not required at the TS835 – 1940's Skeet Range MRS.

1.6 Data Certification Checklist

The following information is included in the Decision Summary section of this ROD (**Section 2.0**).

- Scope and Role of Military Munitions Response Program (**Section 2.3**)
- Current and reasonably anticipated future land use assumptions (**Section 2.5**)
- Summary of Site Risks (**Section 2.6**)
- Remedial Action Objectives (**Section 2.7**)
- Selected Remedy (**Section 2.9**)

Additional information for the TS835 – 1940's Skeet Range MRS at Cannon AFB, New Mexico can be found in the Administrative Record file for TS835 at the following web address: <http://afcec.publicadmin-record.us.af.mil/Search.aspx>.

1.7 Authorizing Signatures

This signature sheet documents the USAF approval of the remedy selected in this ROD for the TS835 – 1940's Skeet Range MRS, Cannon AFB, New Mexico.



J. DALE CLARK, P.E., GS-14, DAF
Deputy Director, Environmental Management Directorate
Air Force Civil Engineer Center

5/30/18
Date

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2.0 DECISION SUMMARY

The Decision Summary provides an overview of the site characteristics, previous investigations and removal actions, identifies the selected remedy, explains how the remedy fulfills statutory and regulatory requirements, and provides a substantive summary of the Administrative Record documents that support the remedy selection decision.

2.1 Site Name, Location and Brief Description

Cannon AFB encompasses approximately 3,789 acres of federally-owned land and is located in Curry County, New Mexico, about eight miles west of the City of Clovis, 12 miles north of the City of Portales, and 190 miles east-southeast of the City of Albuquerque. It is situated in New Mexico's high plains, near the Texas Panhandle (**Figure 2-1**). Cannon AFB is bordered to the east by Curry Road P and to the west by Curry Road R. The boundary of the main portion of the base has remained relatively unchanged since the base's inception.

The TS835 – 1940's Skeet Range MRS consists of approximately 2.45 acres of open field, and is located in the northeast portion of the base, just north of the Former Ordnance/Current Munitions Storage Area (**Figure 2-2**). The firing direction at the range was orientated to the northeast (VERSAR, 2012).

2.1.1 Site History

The 1940's Skeet Range was likely active from at least 1943 to at least 1946 (VERSAR, 2012). As shown in the **Figure 2-2** the firing direction was northeast. During operation, munitions use was suspected to be limited to 12-, 16-, or 20-gauge shotguns with shells containing lead shot. During the active time period for the site, clay targets were composed of various PAH compounds. Typically, skeet ranges were used for training and/or recreational target shooting. No further documentation has been provided regarding the history of munitions-related activities in this area. Based on the operational history of the site (which did not involve the use of explosives) and the findings through previous investigations, there is no potential for Munitions and Explosives of Concern (MEC) to be present at the site.

Based on the Comprehensive Site Evaluation (CSE) Phase II findings (2012), the TS835 - 1940's Skeet Range MRS was recommended for further response action based on elevated PAH concentrations and visual confirmation of clay target debris. The boundary of the TS835 MRS is presented in **Figure 2-2**.

2.1.2 Previous Investigations

Previous investigations performed at the TS835 – 1940's Skeet Range MRS included:

- Modified CSE Phase I (USACE, 2009);
- CSE Phase II (VERSAR, 2012);
- Engineering Evaluation / Cost Analysis (FPM, 2014); and
- Non-Time-Critical Removal Action (FPM, 2015).

A summary of the previous investigation results is provided below. As required by the NCP [40 CFR 300.800(a)], each of these technical documents are on file as part of the Administrative Record.

2.1.2.1 Modified Comprehensive Site Evaluation Phase I

A Modified CSE Phase I was completed in 2009 with the objective to characterize sites and sources; evaluate actual or potential releases(s) of related MC to migration/exposure pathways (groundwater, soil, air); and evaluate associated areas. The primary goal of the CSE Phase I was to determine whether individual sites within the identified installation warrant additional munitions response activities or documentation for an NFA determination. Historical records from on-site and off-site data repositories were reviewed and interviews were completed with personnel knowledgeable about historical munitions activities at Cannon AFB. Based on the Modified CSE Phase I Report, the 1940's Skeet Range site was the only area identified and multiple associated components of the Cannon AFB Modified CSE Phase I were deferred to the CSE Phase II. These elements included the conceptual site model (CSM), the Munitions Response Site Prioritization Protocol (MRSP) scoring elements, and the Hazard Ranking System data elements (VERSAR, 2012). A non-intrusive visual survey of the site was completed to identify physical evidence of potential range related activities. A complete visual reconnaissance was not completed during the Phase I activities due to access to privately owned land being denied. Clay target debris and several slabs of concrete were observed within the boundary. The Modified CSE Phase I recommend that a CSE Phase II be completed (USACE, 2009).

2.1.2.2 Comprehensive Site Evaluation Phase II

The CSE Phase II investigated potential sources of MC from previous range related activities. As the site history indicated that range usage was limited to small arms, and did not involve the use of explosive, MEC was not suspected to be present. The CSE Phase II (VERSAR 2012) activities compiled and evaluated information on Cannon AFB relating to the possible presence of MEC and associated soil contamination from MC. During the CSE Phase II fieldwork, a visual reconnaissance survey of the area was completed. Fluctuating densities of clay target fragments were observed, and the localized areas of these fragments were delineated according to medium and low density (VERSAR, 2012). It was determined that the total area impacted by clay target debris is approximately 2.45 acres.

The CSE Phase II field activities included X-ray fluorescence (XRF) field analysis of surface and subsurface soil samples to evaluate and define the nature and extent of any lead contamination. A total of 41 investigative soil samples were collected and analyzed. Results indicated that there were no elevated concentrations of lead in the surface soil samples and therefore no subsurface samples were collected. The reported lead concentrations were significantly below the NMED SSL of 400 mg/kg and the USEPA residential RSL, also 400 mg/kg for unrestricted/residential land use, in all samples collected. All XRF results were less than 50 mg/kg, and concentrations ranged from non-detect to 26 mg/kg (VERSAR, 2012). The CSE Phase II correlation coefficient of the XRF to laboratory data was 0.92, which was sufficient to define the extent of lead contamination in the field. A background comparison for metals was also conducted during the CSE Phase II. Of the 41 lead samples analyzed by XRF two samples yielded results between the background concentrations of 5.6 – 7.4 mg/kg. All other samples yielded results above the background. The highest reported XRF value from samples collected was 26 mg/kg (VERSAR, 2012).

A total of 25 samples were collected from representative soils at 12 locations within the identified clay target debris area for potential PAH analysis at a fixed-based laboratory. In summary, 14 of the 25 samples collected and analyzed for PAHs yielded concentrations greater than current NMED SSLs, and 20 of the 25 samples yielded concentrations greater than the USEPA RSLs. Analytes detected at concentrations greater than the NMED SSLs and also greater than the USEPA RSLs included; benzo(a)anthracene, benzo(b)fluoranthene, benzo(a)pyrene, dibenz(a,h)anthracene, and indeno(1,2,3-c,d)pyrene (VERSAR, 2012). Benzo(k)fluoranthene was the only analyte detected at concentrations greater than the USEPA RSLs only.

A background PAH study was also conducted as part of the CSE Phase II activities. A total of 10 surface soil samples were collected and analyzed for PAHs. The location where the samples were collected from was similar in soil type and human impact as the site (with the exception of range related impacts). The maximum background concentrations were initially used to screen the data from the site to assess whether the concentrations were elevated, potentially representing contamination from range related activities (VERSAR, 2012). It was determined that PAH concentrations in soils present at the MRS were higher than the background concentrations for several compounds. The results from the soil sampling activities indicated that contamination was found within the top 15 to 18-inches bgs.

The CSE Phase II Report delineated the MRS boundary based on the visual extent of clay target debris and recommended the MRS for future munitions response actions due to the presence of MC-impacted soil (**Figure 2-2**). The MRS was scored utilizing the MRSP and the TS835 MRS (2.45 acres) received a Priority of 4 during the CSE Phase II MRSP evaluation (Priority 1 indicates the highest potential hazard and Priority 8 indicates the lowest potential hazard).

2.1.2.3 Engineering Evaluation/Cost Analysis

An EE/CA was completed for the TS835 – 1940's Skeet Range at Cannon AFB in 2014 to evaluate alternatives and associated costs to mitigate the hazards to human health associated with PAH-impacted soils present within the MRS. The justification provided in the EE/CA concluded that the purpose of a NTCRA is to reduce risks to human health associated with complete exposure pathways. If there is a threat to public health, welfare of the United States, or the environment, the Air Force as the lead agency may take any appropriate removal action to abate, prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release as required by 40 CFR 300.415 (b)(1). Based on the CSE Phase II sampling and analysis results, surface and shallow subsurface soils at the TS835 - 1940's Skeet Range MRS were identified as impacted by PAH concentrations above the NMED SSLs and USEPA RSLs. A NTCRA to address PAH-impacted soil was justified for the following reasons as identified in Section 300.415(b)(2)(i)-(viii) of the National Oil Hazardous Substances Pollution Contingency Plan (NCP):

- Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;
- High levels of contaminants (PAHs) in surface and/or subsurface soils that have the potential to migrate.

Based on a comparative analysis of cost, implementability and effectiveness, excavation and offsite disposal was considered the most effective alternative for public health protectiveness and

the EE/CA recommended this as the preferred alternative for achieving the objectives at this MRS.

2.1.2.4 Non-Time Critical Removal Action

The NTCRA at the TS835 – 1940’s Skeet Range MRS included surface and shallow subsurface excavation and offsite disposal of PAH contaminated soils. The removal area footprint encompassed the entire MRS boundary and soils within were excavated to planned depths based on historical and pre-excavation sampling results (surface to 1.5ft below ground surface) using mechanized equipment. The soil removal operations were carried out on 25 April 2015 through 17 May 2015. A total of 5,904 tons (approximately 5,238 CY) of contaminated soil from the site were transported and disposed of at the Clovis Regional Landfill. Confirmatory end-point soil sampling of the TS835-1940’s Skeet Range MRS exposed excavation “walls” and “floor” was conducted to ensure all residual contamination was removed. The end-point sampling schematic consisted of collecting discrete grab samples on a linear basis from the “walls” and a grid schematic from the “floor”. A total of 47 “floor” and 36 “wall” end-point soil samples were collected and analyzed for PAHs by USEPA Method 8270D Selected Ion Monitoring at a fixed base laboratory. The locations of the samples were recorded using a Trimble DGPS.

The analysis of all end-point confirmation soil samples indicated that residual PAH detections throughout the TS835-1940’s Skeet Range MRS were all below their respective NMED SSLs and also the USEPA residential RSLs (FPM, 2015). Based on confirmatory sampling results the site was restored with clean backfill and seeded with native vegetation.

2.2 Community Participation

NCP Section 300.430(f)(3) establishes a number of public participation activities that the lead agency must conduct following preparation of the Proposed Plan (PP) and review by the support agency. Components of these items and documentation of how each component was satisfied for the TS835 – 1940’s Skeet Range MRS are described in **Tables 2-1 and 2-2** below.

No comments were received during the public comment period. Cannon AFB maintains an existing base-wide community relations plan. All documents related to the MRS are part of the Administrative Record for Cannon AFB and are maintained in the information repository.

Table 2-1 Public Notification of Document Availability

Requirement:	Satisfied by:
Notice of availability of the PP must be made in a general circulation major local newspaper.	Notice of availability was published in the Clovis News Journal and the Portales News-Tribune newspapers which are circulated in the Clovis and Portales areas.
Notice of availability must include a brief abstract of the PP which describes the alternatives evaluated and identifies the preferred alternative (NCP Section 300.430(f)(3)(i)(A))	Notice of availability included all of the required components and is included for reference as Appendix A to this ROD.
Notice of availability should consist of the following information: <ul style="list-style-type: none"> • Site name and location • Date and location of public meeting (if necessary) • Identification of lead and support agencies • Alternatives evaluated in the detailed analysis • Identification of preferred alternative • Request for public comments • Public participation opportunities including: <ul style="list-style-type: none"> ○ Location of information repositories and Administrative Record file ○ Methods by which the public may submit written and oral comments, including a contact person ○ Dates of public comment period ○ Contact person for the community advisory group (e.g., Restoration Advisory Board), if applicable 	

Table 2-2 Public Comment Period Requirements

Requirement:	Satisfied by:
Lead agency should make document available to public for review on same date as newspaper notification.	Document was made available to the public on October 24, 2016. The notification of availability was made on October 25, 2016
Lead agency must ensure that all information that forms the basis for selecting the response action is included as part of the Administrative Record file and made available to the public during the public comment period.	Cannon AFB maintains the Administrative Record file for the TS835 MRS. All data collected and all CERCLA primary documents produced for TS835 are maintained as part of this file which is available to the public electronically at the following web address: http://afcec.publicadmin-record.us.af.mil/Search.aspx .

CERCLA Section 117(a)(2) requires the lead agency to provide the public with a reasonable opportunity to submit written and oral comments on the PP. NCP Section 300.430(f)(3)(i) requires the lead agency to allow the public a minimum of 30 calendar days to comment on the PP and other supporting information located in the Administrative Record and information repository.	The USAF provided a public comment period for the PP from October 27, 2016 to November 27, 2016.
The lead agency must extend the public comment period by at least 30 calendar days upon timely request.	The USAF received no requests to extend the public comment period.
The lead agency must provide the opportunity for a public meeting to be held at or near the site during the public comment period. A transcript of this meeting must be made available to the public and be maintained in the Administrative Record and information repository for the site (pursuant to NCP Section 300.430(f)(3)(i)(E)).	A public meeting was not requested during the public comment period.

2.3 Scope and Role of Military Munitions Response Program

As previously stated, the site has been the subject of two MMRP investigations: a Modified Comprehensive Site Evaluation (CSE) Phase I (USACE, 2009) and a CSE Phase II (VERSAR, 2012).

The Modified CSE Phase I determined that additional investigation was required for the area. A CSE Phase II Work Plan was prepared and the CSE Phase II investigation was performed from 15 March through 18 March 2011. Based on historical skeet range activities and the use of small arms, MEC was not suspected to be present.

TS835 MRS (approximately 2.45 acres) was delineated based on the visual extent of clay target debris and was recommended for future munitions response actions due to the presence of MC-impacted soil.

2.4 Site Characteristics

Located in the northeast portion of the Base, the 2.45-acre TS835 MRS consists of a relatively flat grassy open field and does not contain any structures (**Figure 2-2**). No additional access controls, other than the Base-wide controls, are present at the MRS.

2.4.1 Topography

Cannon AFB is situated in the Southern High Plains section of the Great Plains physiographic province. This section of the plateau is bordered to the north by the Canadian River (which lies approximately 60 miles north of the base), to the east and west by escarpments rising up to 300 ft, and to the south by the Edwards Plateau in western Texas (USACE, 2009). Cannon AFB is situated near the center of the plateau and features relatively flat land with nearly no topographic relief. Elevations range from 4,260 ft above mean sea level in the southeast to 4,330 ft above mean sea level in the northwest portion (USACE, 2009).

2.4.2 Soil and Vegetation

Soils at Cannon AFB and consequently the TS835 – 1940's Skeet Range consist mainly of Amarillo fine sandy loam. This soil is well-drained, and the depth of the underlying water table is approximately 250ft (USACE, 2009). The vegetation at the base is typical of semiarid short grass prairies and is limited by water availability. This vegetation type is consistent with what is found at the TS835 – 1940's Skeet Range MRS (USACE, 2009).

2.4.3 Geology and Hydrogeology

The geology at Cannon AFB consists mainly of a thick 200 to 400ft layer of unconsolidated sediments deposited over Triassic sandstone. The sandstone forms the base of the High Plains aquifer (regionally called the Ogallala aquifer), which is situated within the overlying gravel, sand, and clay sediments (Black & Veatch, 2008). The unconfined aquifer beneath Cannon AFB is the sole source of water supply for the Base. Depth to groundwater is approximately 250 ft bgs and groundwater flow is typically east to southeast, and water table slope is approximately 7 to 15 ft per mile (Black & Veatch, 2008).

2.4.4 Hydrology

The southern High Plains area generally does not contribute to stream flow except during rare periods of excessive rainfall. Cannon AFB is positioned near the headwaters of the Brazos River, nonetheless due to low precipitation, high evapotranspiration, and gently-sloping terrain, little if any runoff ever reaches the river. Additionally, surface water streams are non-existent in the vicinity of the base. The nearest drainage feature is located approximately 10 miles north of Cannon AFB and is mostly dry throughout the seasons. As such there are no site specific drainage or features associated with this MRS. Drainage in the vicinity of the AFB is poorly developed due to low annual rainfall and lack of relief. The only significant surface water features at the installation are several playas and stormwater ponds, located in the northern, eastern, and southern portions of the Base (USACE, 2009).

2.5 Current and Potential Future Land Uses

The TS835 – 1940's Skeet Range MRS is currently designated as open space. According to the Cannon AFB Installation and Development Plan the future, long-term use is not expected to change and the site is anticipated to remain open space with no future planned development.

2.6 Summary of Site Risks

A risk assessment, which evaluated the potential risks to human health and the environment by the soil contamination present at the TS835 MRS, was completed as part of the Phase II CSE.

The assessment determined that residual soil contamination from previous range related activities did not present a risk to the environment, but there were risks identified to human health if the PAH contaminated soils were left in place. No ecological receptors were identified during previous investigations, additionally no threatened or endangered species have been identified at the MRS. A screening-level ecological risk assessment based on the comparison to ecological risk screening levels was not performed for the TS835 MRS due to limited exposure pathways. Clay target debris/pieces are not bio-available to ecological receptors. The risks to human health to surface and subsurface soils were presented in previous investigations and were a result of residual contamination exceeding the USEPA Residential RSLs.

The aforementioned removal action performed in 2015, reduced the human health risk to acceptable levels by removing all contaminated soil and clay target debris within the site boundaries. Confirmation soil sampling documented that the PAH levels of the soil at the TS835 MRS are now below the USEPA and NMED residential screening levels.

2.7 Remedial Action Objectives

Based on the NCP requirements and the applicable ARARs developed in the EE/CA (FPM, 2014), the following RAOs were developed for the NTCRA at the TS835 – 1940's Skeet Range MRS so the site could be recommended for closure under the USAF MMRP:

- 1) Minimized risk to human health and the environment by achieving USEPA residential RSLs and NMED SSLs for PAHs in soil that remained in place;
- 2) Land use controls and five year reviews are no longer required; and
- 3) Attained cleanup levels so that the NFA for UU/UE is possible under future use residential scenarios.

The cleanup levels were determined using the more stringent values of either the USEPA residential RSL or the NMED SSLs. Based on the previous removal action and confirmation end-point soil sampling results, the MRS has no concentrations of chemical contamination that would be a hazard to human health or the environment (FPM, 2015).

2.8 Principal Threat Wastes

The NCP expects that treatment that reduces the toxicity, mobility, or volume of the principal threat wastes will be used to the extent practicable. The principal threat concept refers to the source materials at a CERCLA site considered to be highly toxic or highly mobile that generally cannot be reliably controlled in place or present a significant risk to human health or the environment should exposure occur. A source material is material that contains hazardous substances, pollutants or contaminants that act as a reservoir for migration of contamination to groundwater, surface water, or air, or that acts as a source for direct exposure. Based on the previously discussed NTCRA and confirmation sampling, there are no principal threat wastes identified at the TS835 – 1940's Skeet Range MRS.

2.9 Selected Remedy

The USAF has selected NFA as contamination levels at the site have attained UU/UE levels for the 2.45 acre TS835 – 1940's Skeet Range MRS based on the results of the investigations conducted during the Phase II CSE and the follow-up removal action that removed the PAH-

contaminated soil to residential cleanup levels. This NFA designation requires no land-use controls or restrictions, and no capital, operational, or maintenance costs.

A NFA recommendation for the TS835 – 1940's Skeet Range MRS is supported by the following facts:

- There is no record that explosives were ever used at the MRS; nor was any MEC discovered during the Phase I and II CSE activities;
- The NTCRA, removed soil that contained PAH concentrations above residential levels; and
- Confirmation sampling, as documented in the NTCRA After Action Report, confirmed that PAH levels in soil are below the USEPA RSLs and NMED SSLs.

2.9.1 USEPA Acceptance

The USEPA has reviewed and approved with no comments the Proposed Plan for NFA at the TS835 1940's Skeet Range MRS. The 13 October 2016 USEPA approval letter is provided in **Appendix B**.

2.9.2 Community Acceptance

No comments were received regarding the PP during the public comment period.

2.10 Documentation of Significant Changes

No significant changes were made to the selected remedy identified in the PP (FPM, 2015b).

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3.0 RESPONSIVENESS SUMMARY

This section provides a summary of the public comments regarding the PP for NFA at the TS835 – 1940's Skeet Range MRS and Cannon AFB and AF response to comments.

A public meeting was solicited if warranted, however no written comments were received during the public comment period. A copy of the public notification is provided in **Appendix A**.

3.1 Stakeholder Comments and Lead Agency Responses

The USEPA and NMED have concurred with the conclusions and recommendations in the PP. No comments on the PP were received.

3.2 Technical and Legal Issues

No technical or legal issues were identified during the public review period of the PP.

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4.0 REFERENCES

Black & Veatch 2008. General Plan, Cannon AFB, New Mexico. February.

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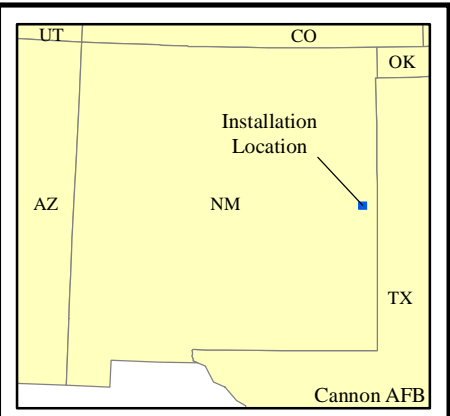
VERSAR. 2012. Comprehensive Site Evaluation Phase II Report – Version 2.0 Military Munitions Response Program (MMRP) Cannon Air Force Base, New Mexico. August.

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FIGURES

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Legend

 Base Boundary

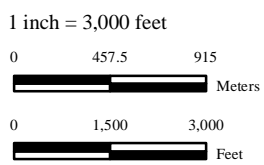
Performance Based Remediation
 New Mexico-Arizona
 Cannon Air Force Base
 Clovis, NM
 AFCEC

FIGURE 2-1

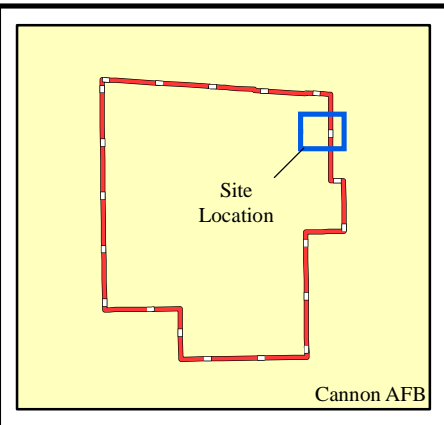
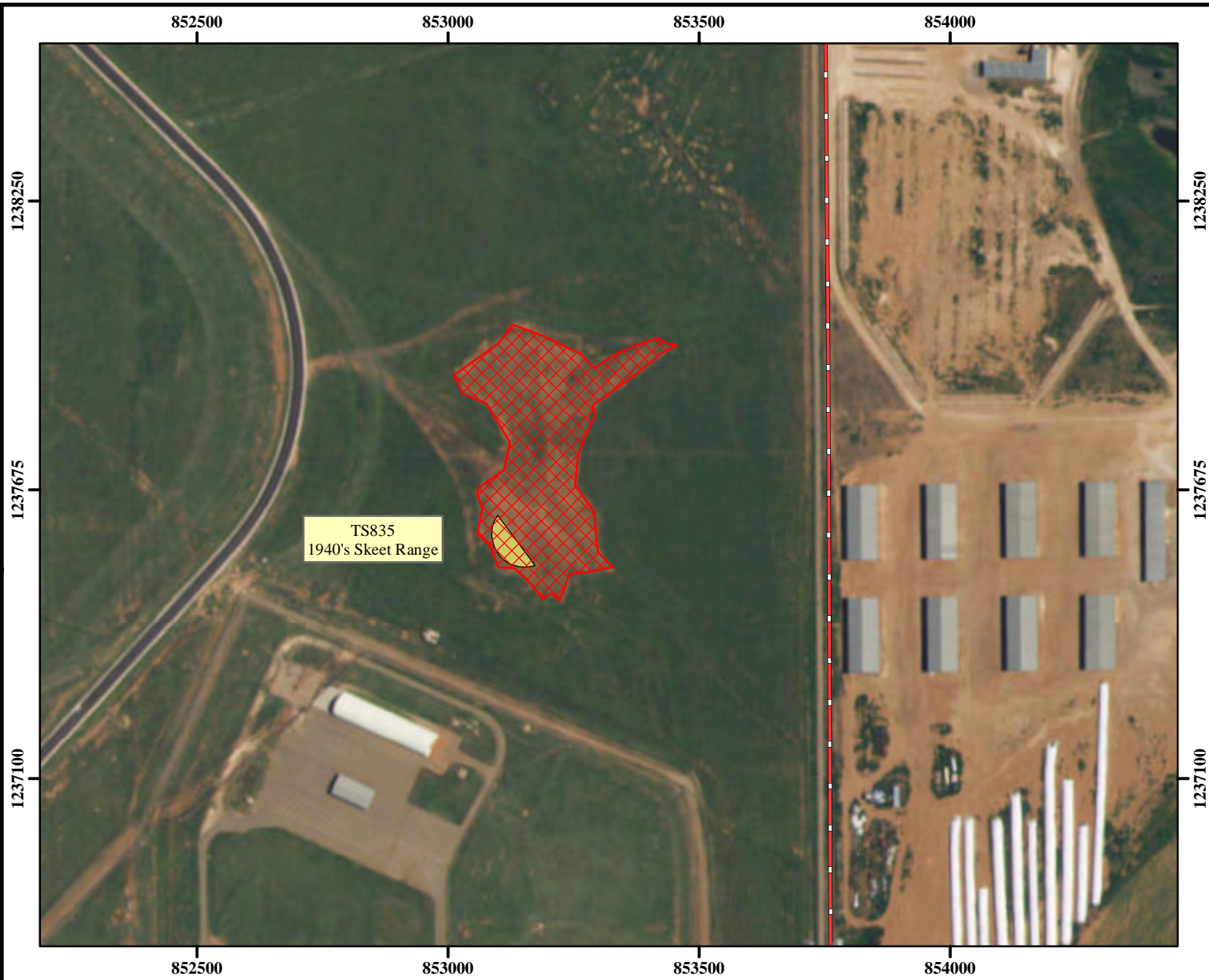
Cannon Air Force Base
Location

NOTES:
 Revision Date: 12/14/2016




Coordinate System: NAD 1983 StatePlane New Mexico East FIPS 3001 Feet
 Projection: Transverse Mercator
 False Easting: 541,337.5000
 Central Meridian: -104.3333
 Latitude Of Origin: 31.0000
 Horizontal Datum: North American 1983
 False Northing: 0.0000
 Scale Factor: 0.9999
 Units: Foot US



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Legend

-  TS835
-  Suspected Historic Firing Line
-  Base Boundary

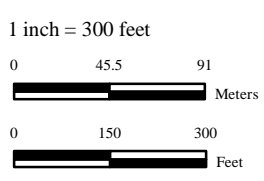
Performance Based Remediation
 New Mexico-Arizona
 Cannon Air Force Base
 Clovis, NM
 AFCEC

FIGURE 2-2

TS835
 1940's Skeet Range MRS Boundaries

NOTES:
 Revision Date: 3/3/2017

Coordinate System: NAD 1983 StatePlane New Mexico East FIPS 3001 Feet
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 False Easting: 541,337.5000
 Central Meridian: -104.3333
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 Horizontal Datum: North American 1983
 False Northing: 0.0000
 Scale Factor: 0.9999
 Units: Foot US



Appendix A
Public Notice

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AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF CURRY

Tammy Newby being duly sworn says:

That she is the Advertising Representative of Clovis Media Inc., which includes the CLOVIS NEWS JOURNAL (CNJ) published in English at Clovis, NM, said county and state, and that the attached ran in the CLOVIS NEWS JOURNAL on 10/25/2016

Tammy Newby

Subscribed and sworn to before
This 25th day of October, 2016

Leslie Nagy
NOTARY PUBLIC



OFFICIAL SEAL
LESLIE NAGY
NOTARY PUBLIC STATE OF NEW MEXICO

Leslie Nagy

My commission expires _____
My commission expires 05/24/2019

**PROPOSED PLAN
for TS835 - 1940's SKEET RANGE MUNITIONS RESPONSE SITE
at CANNON AIR FORCE BASE, NEW MEXICO**

Cannon Air Force Base (AFB) in Curry County, New Mexico announces the availability of the Proposed Plan for the 1940's Skeet Range Munitions Response Site. This site is being addressed under the United States Air Force Military Munitions Response Program in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980. The Military Munitions Response Program was established to address non-operational defense sites located on current and former military installations. This Proposed Plan recommends No Further Action following the completion of an Engineering Evaluation/Cost Analysis, a Non-Time Critical Removal Action, and a Non-Time Critical Removal Action After Action Report. The Non-Time Critical Removal Action After Action Report documented that residual soil contamination resulting from range related activities has been removed and remaining soil concentrations are below the United States Environmental Protection Agency Residential Regional Screening Levels and the New Mexico Environment Department Residential Soil Screening Levels at the Site.

The Proposed Plan is available for public review during the 30-day public comment period from October 27th to November 27th at the Clovis-Carver Public Library Monday through Thursday from 9 a.m. to 9 p.m., and Friday through Saturday from 9 a.m. to 5 p.m. They can also be reached by phone at 575-769-7840.

If you would like to provide any written comments or questions to this Proposed Plan, they can be submitted to:

27 SOW Public Affairs
110 Alison Ave Ste 1150
Cannon AFB, NM 88103
575-784-4131

27SOWPA.publicaffairs@us.af.mil

A Public Meeting will be held at the Clovis-Carver Public Library, 701 N. Main Street, Clovis NM if Public Comments are received.

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF ROOSEVELT

Tammy Newby being duly sworn says:

That she is the Advertising Representative of Clovis Media Inc., which includes the PORTALES NEWS-TRIBUNE (PNT) published in English at Portales, NM, said county and state, and that the attached ran in the PORTALES NEWS-TRIBUNE on 10/25/2016

Tammy Newby

Subscribed and sworn to before
This 25th day of October, 2016



Leslie Nagy
NOTARY PUBLIC
Leslie Nagy

OFFICIAL SEAL
LESLIE NAGY
NOTARY PUBLIC STATE OF NEW MEXICO

My commission expires _____

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Appendix B
USEPA Letter of Approval

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

October 13, 2016

Ludie W. Bitner
Restoration Project Manager, IST
2050 Wyoming Boulevard S.E., Bldg. 20685
Kirtland AFB, NM 87117

RE: Review of the Proposed Plan for Remedial Action at MMRP site TS-835 Munitions Response Site – Cannon Air Force Base, New Mexico Dated June 2016.

Dear Mr. Bitner:

The Proposed Plan was received on August 23, 2016. I have completed my review and have no comments. Please continue to coordinate with the New Mexico Environment Department on investigation and cleanup of sites such as this.

If you have any questions or concerns, please contact me at (214) 665-8306.

Sincerely,

Gary W. Miller, P.E.

Gary W. Miller, P.E.
Environmental Engineer
RCRA Corrective Action Section, 6MM-RC
EPA Region 6

cc Sheen Thomas Kottkamp MS
Scott Clark