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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

June 26, 2018

Colonel Stewart A. Hammons
Commander, 27th Special Operations Wing
110 E. Alison Avenue, Suite 1098
Cannon Air Force Base
New Mexico 88103

**RE: APPROVAL WITH MODIFICATIONS
MONITORING WELL ABANDONMENT, INSTALLATION, AND
SAMPLING REPORT LF005 (SWMU 113) AND SI101 (SWMU 101)
CANNON AIR FORCE BASE, NEW MEXICO
EPA ID #NM7572124454
HWB-CAFB-17-012**

Dear Colonel Hammons:

The New Mexico Environment Department (NMED) has reviewed the Cannon Air Force Base (Permittee) *Monitoring Well Abandonment, Installation, and Sampling Report LF005 (SWMU [Solid Waste Management Unit] 113) and SI101 (SWMU 101)* (Report), dated December 21, 2017. NMED hereby issues this Approval with the following modifications.

MODIFICATIONS

1. Section 3.0, Investigation-Derived Waste [IDW], page 3-1

Permittee's Statement: "Upon review of the soil IDW analytical results, it was determined that soil concentrations from five roll-off containers did not exceed NMED residential SSLs which allowed for onsite reuse of the soil for site repairs, while the contents of one roll-off container were disposed of at the Clovis, NM [New Mexico] Municipal Landfill (16 cubic yards [4.85 tons])."

NMED Comment: Provide the analytical results for all IDW sampling in Appendix I, Disposal Tracking. The information must be referenced in all appropriate Report sections, and respective replacement pages must be provided.

2. Figure 2, LF005 Monitoring Well Locations

NMED Comment: The coordinates given for each monitoring well location in Figure 2 do not match the map coordinate scale or the Appendix G, Survey Data information. Correct the discrepancy and provide a revised figure as a replacement page.

3. Table 2, Summary of Groundwater Analytical Results – September 2017

NMED Comment: There are multiple issues with Table 2. Revise the table and relevant Report sections to address the following comments and provide the appropriate replacement pages.

- a) United States Environmental Protection Agency (USEPA) Maximum Contaminant Levels (MCLs) are referenced in the table as May 2009. Revise the table and screening levels to reference the most recent USEPA MCLs or remove the date reference.
- b) The chromium VI screening level utilized in Table 2 is the NMED noncancer tap water screening level (26.7 micrograms per liter (ug/L)). Previously provided direction in NMED's *Approval with Modifications 2016 Biennial Groundwater Monitoring and Annual Landfill Inspection Report* response letter dated December 5, 2017 states, "[h]exavalent chromium concentrations detected in facility monitoring well groundwater samples must be evaluated with the established NMGWQS [New Mexico Groundwater Quality Standard] for chromium 50 µg/L." Additionally, the appropriate NMED tap water screening level for chromium VI is the more conservative cancer screening level (0.501 ug/L). Revise the table to reference the NMGWQS standard and cancer tap water screening level and evaluate the groundwater sample concentration data accordingly. Revise all affected Report sections.
- c) Table 2 lists tap water screening levels for barium, cobalt, and mercury as 32.8 ug/L, "not established", and 389 ug/L, respectively. The 2017 *NMED Risk Assessment Guidance for Site Investigations and Remediation, Table 4-1: NMED Soil Screening Levels* provides respective tap water screening levels for barium, cobalt, and mercury, which are 3,280 ug/L, 5.98 ug/L, and 0.626 ug/L. Revise the table to include the correct screening levels.
- d) Table 2 does not list all COCs detected in collected groundwater samples at the sites based on the information provided in Appendix H, Laboratory Analytical Data. For example, acetone concentrations were detected at 6.8 J ug/L and 7.6 J ug/L in groundwater samples MWCA-9-2017 and MWCA-9-2017-A, respectively. Revise the table to include all detected COC concentration information.

4. Appendix F, Well Development Logs

NMED Comment: Information provided in Appendix F, Well Development Logs indicated the final turbidity readings for monitoring wells MW-Ca, MW-Fa, MW-Ta and MW-Ua were 20.1 nephelometric turbidity units (NTU), 40.1 NTU, 34.4 NTU, and 30.8 NTU, respectively. Groundwater sample collection field sheet information provided in Appendix B, *Field Notes, Field Forms, and Daily Reports* report turbidity readings for the same wells were elevated at 17.4 NTU, 16.6 NTU, 40.0 NTU, and 21.2 NTU during the September 2017 groundwater sampling event despite the use of low-flow purging and sampling methodology. Final turbidity measurements were observed to be elevated for all monitoring wells during final well development water quality field measurements. If the monitoring wells continue to produce groundwater with turbidity readings above 10 NTU during future sampling events, well redevelopment may be required.

The Permittee must provide replacement pages that address NMED's modifications, a response letter that cross-references where NMED's modifications were addressed, an electronic redline-strikeout version of the Report and a revised electronic copy of the Report to NMED no later than **August 31, 2018**.

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

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

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