



SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor


State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6313
Phone (505) 476-6000 Fax (505) 476-6030
www.env.nm.gov



BUTCH TONGATE
Cabinet Secretary
BRUCE YURDIN
Acting Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

October 25, 2018

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

**RE: DISAPPROVAL
ACCELERATED CORRECTIVE MEASURES
COMPLETION REPORT SITE SW127
CANNON AIR FORCE BASE, NEW MEXICO
EPA ID #NM7572124454
HWB-CAFB-17-010**

Dear Col. Hammons:

The New Mexico Environment Department (NMED) is in receipt of the Cannon Air Force Base (Permittee) *Accelerated Corrective Measures Completion Report Site SW127 [Solid Waste Management Unit (SWMU) 127]* (Report), received November 28, 2017. NMED has reviewed the Report and hereby issues this Disapproval. The following comments must be addressed.

GENERAL COMMENTS

1. Risk Screen Evaluation Data (Thallium)

NMED Comment: The human health risk assessment is inconsistent in its presentation of the maximum detected concentration of thallium in the surface to ten feet below ground surface (bgs) depth interval. Both 2.00E-01 milligrams per kilogram (mg/kg) and 5.40E-01 mg/kg are presented as the maximum detected concentration for thallium. Inconsistencies were also noted for thallium in the ProUCL input files. The following issues were noted

during review of the provided risk evaluation information for thallium and must be addressed as follows:

- a. Appendix E, Human Health Risk Assessment, Table E-1 references a maximum concentration of $5.40E-01$ mg/kg for thallium. However, a detection of $5.40E-01$ mg/kg was not identified among the concentration data provided in the Report. The verifiable maximum concentration identified in the sample analysis result data was $2.00E-01$ mg/kg (J-qualified). The table also indicates that thallium was detected in eight of 47 samples. Only seven detections were identified during review of the provided concentration data. To ensure accuracy, consistency, and completeness, reevaluate all thallium concentration data, and revise all affected tables, data, and Report text accordingly.
- b. Table E-5 references $2.00E-01$ mg/kg as the maximum subsurface soil concentration for the one to ten feet bgs exposure interval for the thallium background evaluation and uses that concentration in determining if thallium is a constituent of potential concern (COPC) for SWMU 127 with respect to established background upper tolerance levels (UTLs). Seven detections were reported for 42 samples in the table information. To ensure accuracy, consistency, and completeness, reevaluate all thallium concentration data, and revise all affected tables, data, and Report text accordingly.
- c. Tables E-7, E-9, and E-10 reference $5.40E-01$ mg/kg as the maximum soil concentration for thallium within the surface to ten feet bgs human health exposure interval. The referenced maximum concentration could not be verified with the concentration data set provided in the Report. Additionally, 39 thallium detections were reported for 47 samples on each table. To ensure accuracy, consistency, and completeness, reevaluate all thallium concentration data and revise the tables and all affected Report information accordingly. The revised Report must include all sample concentration data information for respective chemicals of concern (COCs).
- d. Section 4.4.2, Comparison of Site Inorganics to Background, also references $2.00E-01$ mg/kg as the maximum concentration for thallium in subsurface soils (one to ten feet bgs). To ensure accuracy, consistency, and completeness, reevaluate all thallium concentration data and revise the Report accordingly.
- e. The ProUCL input files for determining summary statistics for metals in subsurface soils (one to ten feet bgs) accounts for only seven thallium detections. The maximum thallium concentration $5.40E-01$ mg/kg was not identified as a detection in the input data set files. To ensure accuracy, consistency, and completeness, reevaluate all thallium concentration data and revise all affected Report data and ProUCL input and output data. Revise the Report accordingly.
- f. Tables E-14 and E-15 reference $3.13E+01$ mg/kg as the 95% UCL for thallium. The UCL value is used in calculating the refined risk and hazard for residents and

construction workers. The UCL was calculated with an input data set that includes eight detections out of 47 sample results. The concentration $5.40\text{E}-01$ mg/kg was included as a detection in the 95% UCL calculation data set. To ensure accuracy, consistency, and completeness, reevaluate all thallium concentration data and revise all affected Report data and ProUCL input and output data. Revise the Report accordingly.

Any assumptions made in evaluating human health exposures related to thallium must be discussed in Section 4.7, Uncertainties.

2. Risk Screen Evaluation Data (Cobalt and Manganese)

NMED Comment: The human health risk assessment is inconsistent in its presentation of the maximum detected concentration of cobalt and manganese in the surface to ten feet bgs depth interval. Both $5.20\text{E}+00$ mg/kg and $8.00\text{E}+00$ mg/kg are presented as the maximum detected concentration for cobalt; maximum soil concentrations of $2.18\text{E}+02$ mg/kg and $3.40\text{E}+02$ mg/kg are presented for manganese. The following inconsistencies were noted during review and must be addressed as follows:

- a. Section 4.4.2 references $5.20\text{E}+00$ mg/kg as the maximum concentration for cobalt and $2.18\text{E}+02$ mg/kg as the maximum concentration for manganese within the one to ten feet bgs sample interval, which does not correspond to the Table E-1 information referenced in the section. Table E-1 references a maximum concentration of $8.00\text{E}+00$ mg/kg for cobalt and a maximum concentration of $3.40\text{E}+02$ mg/kg for manganese. To ensure accuracy and consistency, reevaluate all concentration data, table data, risk assessment results, and Report information. Revise any affected sections of the Report accordingly.
- b. Table E-1 references $8.00\text{E}+00$ mg/kg as the maximum concentration for cobalt and a maximum concentration of $3.40\text{E}+02$ mg/kg as the maximum concentration for the surface to ten feet bgs. To ensure accuracy and consistency, reevaluate all concentration data, table data, and risk assessment results. Revise the Report as necessary.
- c. Table E-5 references the maximum soil concentrations given in Section 4.4.2 for cobalt ($5.20\text{E}+00$ mg/kg) and for manganese ($2.18\text{E}+02$ mg/kg) in the table for the evaluation of COPCs based on established background UTLs. To ensure accuracy and consistency, reevaluate all concentration data, table data, and risk assessment results. Revise the Report as necessary.
- d. Tables E-7, E-9, and E-10 reference $8.00\text{E}+00$ mg/kg and $3.40\text{E}+02$ mg/kg as the maximum soil concentrations for cobalt and manganese, respectively. The maximum concentrations were used for evaluation of human health risk for each constituent in mixed zone soils. To ensure accuracy and consistency, reevaluate all concentration data, table data, and risk assessment results. Revise the Report as necessary.

- e. Tables E-14 and E-15 references 3.59E+00 mg/kg and 1.23E+02 mg/kg as the 95% UCLs for cobalt and manganese, respectively. These values were used in calculating the refined risk and hazard for residents and construction workers. To ensure accuracy and consistency in the provided data utilized for UCL calculation, reevaluate all concentration data and ProUCL input and output data files. Revise the Report as necessary.
- f. The ProUCL input file for determining summary statistics indicates the statistics are based on maximum concentrations of 5.20E+00 mg/kg and 2.18E+02 mg/kg for cobalt and manganese, respectively. To ensure accuracy and consistency, reevaluate all concentration data and ProUCL input and output data files. Revise the Report as necessary.
- g. The ProUCL input file for determining the exposure point concentrations (EPCs) for the refined risk evaluation lists maximum concentrations of 8.00E+00 mg/kg and 3.40E+02 mg/kg for cobalt and manganese, respectively. To ensure accuracy and consistency, reevaluate all concentration data and ProUCL input and output data files. Revise the Report as necessary.
- h. The manganese ProUCL input values listed for samples CA127-EB09-004 with a reported concentration of 1.71E+02 mg/kg and CA127-EB10-004 with a reported concentration of 1.56E+02 mg/kg have been incorrectly listed in the input data files as 17.1 mg/kg and 15.6 mg/kg, respectively. To ensure accuracy and consistency, reevaluate all concentration data and ProUCL input and output data files. Revise the Report accordingly.

Any assumptions made in evaluating human health exposures related to cobalt and manganese must be discussed in Section 4.7.

3. Risk Screen Evaluation Data (Phenanthrene and Pyrene)

NMED Comment: Discrepancies in referenced maximum concentrations were noted in the data provided in Table E-2 Summary of Surface Soil (surface to one-foot bgs) Analytical Results at SW127 [SWMU 127] for phenanthrene (8.25E-02 mg/kg) and pyrene (1.60E-01 mg/kg). The referenced maximum concentrations for each COC were not identified as detections in the Table E-2 data. Table E-2 indicates detections above the referenced maximum concentrations were not considered. For example, concentrations ranging from 1.85E-01 mg/kg to 3.59E-01 mg/kg were reported for phenanthrene and concentrations ranging from 1.70E-01 mg/kg to 8.98E-01 mg/kg were reported for pyrene in the data included in Table E-2. Table 4-1, Summary of Confirmation Soil Sample Results, references maximum concentrations for phenanthrene and pyrene as 3.59E-01 mg/kg and 8.98E-01 mg/kg, respectively. These results were further corroborated by Table E-8, Comparison of Maximum Detected Concentrations at SW127 To Screening Criteria - Surface Soil data, which also references the maximum surface soil concentrations listed in Table 4-1 for each COC.

Reevaluate all concentration data for phenanthrene and pyrene and ensure the data presented in the Report is accurate and complete. Revise the Report accordingly. Any assumptions made in evaluating exposures related to phenanthrene and pyrene must be discussed in Section 4.7.

4. Risk Screen Evaluation Data (Iron)

NMED Comment: The Table E-2 maximum concentration for iron (1.34E+04 mg/kg) was not identified in the data presented in the table. A concentration of 1.30E+04 mg/kg was identified in the sample analysis result data provided in Table E-2. Table 4-1 references a maximum sample concentration of 1.30E+04 mg/kg for iron. Table E-8 references a maximum surface soil concentration for iron of 1.34E+04 mg/kg. Table E-11 Human Health Quantitative Screening Evaluation Result for SW127 Commercial/Industrial Worker Scenario-Surface Soil, also references the maximum concentration 1.34E+04 mg/kg. Reevaluate all concentration data for iron and ensure the data presented in the Report is accurate, consistent, and complete. Revise the Report accordingly. Any assumptions made in evaluating exposures related to iron must be discussed in Section 4.7.

5. Organization of Report Information Included as Tables in Report Text

NMED Comment: Tables which do not have a specific table number designation were incorporated into the narrative portions of Section 4, Analytical Results and Human Health Risk Assessment. The revised Report must be restructured to include all tables information at the end of each Report section. The tables must be clearly labeled, numbered, include respective page numbers, and be appropriately referenced in the Report section.

SPECIFIC COMMENTS

6. Section 2.2, SW127 (SWMU 127) Description, Page 2-6

NMED Comment: Revise Section 2.2 to include a complete accounting of the wash rack usage history and components to the present. A Closed Loop Washrack POL [Petroleum, Oil and Lubricants] Facility Design Drawing/Site Detail Plan (Site Detail Plan) with an as-built drawing date of February 15, 1996 included in Appendix H indicates continued usage of SWMU 127 as a wash rack following in-place abandonment of the oil water separator (OWS) and replacement leach field. The Site Detail Plan was not provided in prior submittals. Noted additions to the wash rack based on the Site Detail Plan included a concrete separation pit depicted upstream of the abandoned OWS and adjacent to the wash rack and a utility building housing wash equipment, chemicals, an unspecified storage tank, an air compressor for the separation pit sump pump, an "RFG Unit", and various associated subsurface conduit lines. The depicted separation pit appears to have replaced the OWS at the wash rack. Reconcile the provided Site Detail Plan in the revised Report with the previously documented site conditions and historical information. Include all additional information regarding continued wash rack use after the in-place abandonment of the OWS and subsequent removal. Any affected Report sections including figures and appendices must

also be revised to accurately account for the additional information.

7. Section 2.3.1, Phase I RCRA Facility Investigation [RFI], Page 2-7

Permittee Statement: “One 60-foot boring was drilled adjacent to the OWS and five 60-foot borings were drilled within the new and abandoned leach fields.”

NMED Comment: Figure 2-5, Historical Sample Locations map, does not depict a boring completed adjacent to the former OWS. Report figure information indicates two samples were advanced at the wash rack pad and six borings were advanced within the leach field areas during the Phase I investigation activities. Reevaluate the Phase I RFI historical sampling information and revise the Report accordingly. Include any additional information and sampling data collected at the OWS in the revised Report.

8. Table 2-1, 1993 Phase I RFI Soil Sampling Analytical Results

NMED Comment: The following issues were identified for Table 2-1 and must be addressed in the revised Report:

- a. The given NMED Risk-Based soil screening level (SSL) for dilution attenuation factor (DAF) 20 for acenaphthene ($8.51E+02$ mg/kg) does not correspond to the 2017 NMED risk-based SSL for DAF 20 ($8.25E+01$ mg/kg), nor does it match the June 2017 Environmental Protection Agency (EPA) Regional Screening Level (RSL) for protection of groundwater ($5.5E+00$ mg/kg). Revise the screening level to reflect the current acenaphthene NMED SSL for DAF 20 for acenaphthene. Reevaluate the concentration data accordingly.
- b. Revise the table to note that the residential SSL and risk-based SSL for DAF 20 for pyrene have been utilized as the surrogate screening levels for benzo(g,h,i)perylene.
- c. The referenced EPA RSL value listed as the residential SSL for butyl benzyl phthalate is the EPA tap water screening level listed on the June 2017 EPA RSL table. Additionally, all EPA SSLs for carcinogens must always be adjusted to reflect a target risk factor of $1.0E-05$. Revise the screening level and reevaluate the concentration data in the table accordingly.
- d. The listed residential SSL for 2-methylnaphthalene is the EPA tap water screening level listed on the June 2017 EPA RSL table. For consistency with NMED’s 2017 Risk Assessment Guidance for Site Investigations and Remediation (RA Guidance), revise the table to reference the 2017 NMED SSL for 2-methylnaphthalene $2.32E+02$ mg/kg and the NMED soil-to-groundwater SSL for DAF 20 $2.76E+00$ mg/kg for 2-methylnaphthalene. Revise the screening level and reevaluate the concentration data provided in the table accordingly.

9. Table 2-2, 1994 Phase II RFI Soil Sampling Analytical Results

NMED Comment: The following issues were identified for Table 2-2 and must be addressed in the revised Report:

- a. The listed residential RSL value for benzoic acid is the EPA tap water screening level value listed on the June 2017 EPA RSL table. Revise the table to list the correct residential RSL for benzoic acid. Reevaluate the concentration data provided in the table accordingly.
- b. The EPA RSL value listed as the residential SSL for butyl benzyl phthalate is the EPA tap water screening level listed on the June 2017 EPA RSL table. Additionally, adjust the screening level to reflect the NMED target risk factor of 1.0E-05 for carcinogens. Revise the screening level and reevaluate the concentration data provided in the table accordingly.
- c. The listed residential SSL for di-n-octyl phthalate is the EPA tap water screening level listed on the June 2017 EPA RSL table. Revise the table to reference the correct residential RSL for di-n-octyl phthalate. Reevaluate the concentration data accordingly.

10. Table 2-3, 2008 Voluntary Corrective Action Soil Sampling Analytical Results

NMED Comment: The given NMED Risk-Based SSL for DAF 20 for acenaphthene does not correspond to the 2017 NMED soil-to-groundwater SSL for DAF 20, nor does it match the June 2017 EPA RSL for protection of groundwater. Revise the screening level to reflect the NMED acenaphthene soil-to-groundwater SSL for DAF 20 in the table. Reevaluate the concentration data accordingly.

11. Section 3.1.1, Ground Penetrating Radar [GPR] Survey

Permittee Statement: “The GPR data suggested that the OWS has been removed from the area designated with a yellow Rectangle on the figures. The anomalies identified in the figure were believed to be terminated pipes associated with the former OWS system.”

NMED Comment: The GPR survey scope of work was not included in the Accelerated Corrective Measures Work Plan as approved in NMED’s November 28, 2016 *Approval with Modifications Accelerated Corrective Measure Work Plan Site SW127* response. However, as additional supporting information, Section 3.1.1 must also include additional details regarding the survey methods used and the data collected during the GPR and overlapping magnetic survey (G858) and electromagnetic (EM61) surveys. Comprehensively discuss all of the data and anomalies identified during the survey. To the extent practical, correlate the survey information to the documented SWMU 127 wash rack components (e.g., sand trap, OWS, distribution box, piping, and abandoned leach fields) and the Site Detail Plan included in Appendix H. Discuss the survey interpretation in the revised Report. Additionally, submit

the complete GPR survey report for NMED review as a separate document with the revised Report no later than **March 29, 2019**. Currently, Appendix H only includes four figures from what is assumed to be a complete report documenting the GPR survey.

12. Section 3.2.1.2, Main Excavation

Permittee Statement: “A concrete distribution box associated with the previously removed OWS was uncovered in the main excavation. The concrete box measured 4.0 feet on each side and approximately 3 feet deep. The concrete box and associated piping was removed from the excavation and disposed of at the Clovis Regional Landfill.”

NMED Comment: Provide a discussion detailing the exact location of the distribution box, its association to the former OWS and other wash rack components in the revised Report. Revise Figure, 2-5, Historical Sample Locations, Figure 3-1, Excavation Boundaries, and Figure 3-2, Confirmation Sampling Locations to include the location of the distribution box with respect to the sample locations. Revise the Report accordingly.

13. Section 3.2.4.2, Main Excavation

Permittee Statement: “The purpose of the confirmation sampling was to confirm that the remaining concentrations of PAH [polynuclear aromatic hydrocarbons] in the soil do not exceed NMED residential SSLs”

NMED Comment: Provide a rationale for not collecting confirmation samples within the area defined by sample locations 12706, 12707, and 12708 where PAH concentrations were reported in surface soils during prior investigations. Revise the Report accordingly.

14. Figure 3-2, Confirmation Sampling Locations

NMED Comment: The following issues were identified for Figure 3-2 and must be addressed in the revised Report:

- a. The confirmation sample locations appear to be shifted away from the sample location label designators for all sample locations depicted on the figure. For example, the sidewall sample locations on the eastern portion of the excavation (SW17, SW18, and SW19) are depicted outside of the excavation and on the eastern side of the fence line where no excavation or confirmation sampling was conducted. Revise the figure to accurately depict the sample locations and sample designation information.
- b. Revise the figure to include a sample location symbol for sidewall sample SW20.
- c. The excavation that addressed the PAH screening level exceedance at soil boring SB13 does not appear to have encompassed the former sampling location based on the excavation boundary depicted on the figure. Correct the discrepancy or provide

the rationale for the final extent of the SB13 excavation in the revised Report. Ensure that all depicted excavation boundaries reflect the actual extent of the excavations.

15. Section 4.3.10, Evaluation of the Vapor Intrusion Pathway, Page 4-6

Permittee Statement: “A vapor intrusion evaluation was completed as part of the *Revision 2 Final Risk Screen Evaluation for Solid Waste Management Unit [SWMU] 127 Report* [SWMU 127 Risk Screen Evaluation Report] dated 22 October 2015. The results of the evaluation indicated estimated cancer risk were $1E-06$ for residents and below $1E-6$ for industrial workers. HIs [hazard indices] for both receptors were below 1. NMED approved this report in a letter dated 18 March 2016. NMED screening criteria for soil gas has not changed since the review and approval of the document; therefore, NMED’s approval is still considered valid. For purposes of this corrective measures action, evaluation of the vapor intrusion pathway is considered complete and was not evaluated in this risk screen.”

NMED Comment: NMED’s March 18, 2016 *Approval Revision 2 Final Risk Screening Evaluation for Solid Waste Management Unit 127* response stated “NMED’s decision is based on the information available at this time. If deemed necessary at a later date by NMED, the Permittee may be required to conduct further corrective action investigation at this site [SWMU 127].” Additionally, the SWMU 127 Risk Screen Evaluation Report conclusions indicated the site only qualified for a corrective action complete with controls status. Additional corrective action has been voluntarily conducted by the Permittee with the intent of meeting the criteria for corrective action complete without controls. Therefore, NMED requires further evaluation of cumulative risk at SWMU 127 in accordance with RA Guidance, Section 5.0, Use of the SSLs and must include calculated total cumulative risk and cumulative hazard for vapor intrusion and soil exposure for the applicable human health receptors. Revise the Report accordingly.

16. Section 4.4.4, Quantitative Risk Screening Evaluation, Page 4-10:

NMED Comment: Section 4.4.4 must be revised to include a discussion of the results for total combined cumulative risk for soil and vapor intrusion exposure for the applicable residential and industrial/occupational human health receptors. Revise the Report accordingly.

17. Section 4.4.7, Refined Qualitative Risk Screening Evaluation for Soil, Page 4-13:

NMED Comment: Section 4.4.7 table information lists the 95% upper confidence levels (UCLs) calculated by ProUCL for the surface to ten feet bgs input data set. The table information includes a UCL value of $2.52E+01$ mg/kg for toluene. However, the UCL concentration was not identified in the ProUCL input and output file data provided in Appendix E. ProUCL recommended the 99% KM Chebyshev UCL of 24.15 mg/kg as the EPC for toluene. Tables E-14 and E-15 indicate that $2.52E+01$ mg/kg UCL was used in estimating the hazard quotient for toluene in the refined risk evaluation for the residential and construction worker exposure scenarios. Revise the section to include a discussion that

clarifies and justifies the use of 2.52E+01 mg/kg as the EPC for toluene. Also discuss the method utilized for the calculation of the EPC and explain the rationale for use of the referenced concentration value instead of the recommended ProUCL EPC. If adequate justification cannot be provided for use of the EPC referenced in the risk evaluation, refined risk must be recalculated for toluene with the ProUCL recommended EPC for toluene. Revise the Report accordingly.

18. Section 4.4.7, Refined Qualitative Risk Screening Evaluation for Soil, Page 4-14:

NMED Comment: Section 4.4.7 must be revised to include a discussion of the refined cumulative risk evaluation that accounts for total combined cumulative risk for the soil and vapor intrusion exposure for the applicable human health receptor(s) exposure. Revise the Report accordingly.

19. Section 4.5, Soil-to-Groundwater Evaluation, Page 4-16:

NMED Comment: The Permittee's soil-to-groundwater evaluation indicates concentrations of arsenic and thallium were determined to be indicative of background conditions and were not considered COPCs requiring further evaluation. However, Section 4.4.2, Comparison of Site Inorganics to Background information indicates the maximum thallium concentration exceeded the background UTL. Additionally, sufficient concentration data was not available to perform a two sample-hypothesis test to confirm the assumption that thallium concentrations at SWMU 127 are indicative of background. Therefore, thallium was retained as a COPC for further risk evaluation. Table E-5 data also confirms the maximum thallium concentration (2.00E-01 mg/kg) exceeded the background UTL. It is unclear how the Permittee ultimately determined that concentrations of thallium were indicative of background conditions during the evaluation of the soil-to-groundwater pathway. Section 4.5 must be revised to demonstrate how thallium concentrations were determined to be reflective of background conditions. If adequate supporting information cannot be provided, thallium must be included in the evaluation of the soil-to-groundwater pathway for SWMU 127.

20. Section 4.5, Soil-to-Groundwater Evaluation, Page 4-16:

NMED Comment: Section 4.5 must include additional lines of evidence supporting the assertion that the soil-to-groundwater pathway at SWMU 127 is incomplete. At a minimum, the revised discussion must include the following information:

- a. The annual rate of precipitation at the Cannon Air Force Base;
- b. Physical and/or chemical property values to strengthen the lines of evidence related to the impact of subsurface conditions on vertical migration of contamination; and
- c. A discussion on the vertical profile of contamination at SWMU127. Relate the vertical extent of contamination to the depth to groundwater.

Revise the Report accordingly.

21. Table 4-1, Summary of Confirmation Soil Sample Results

NMED Comment: The following issues were identified for Table 4-1 and must be addressed in the revised Report:

- a. The excavation bottom confirmation sample results for EB01-003 were omitted from the table information. Revise the table to include all confirmation sample results.
- b. The residential SSL for pyrene ($1.74E+03$ mg/kg) was utilized for the screening level evaluation of benzo(g,h,i)perylene in the Section 2 concentration data tables and must also be used for the evaluation of the COC concentration data presented in the table. Revise the table and reevaluate the concentration data accordingly.

22. Sections 5, Conclusions and Recommendations, Pages 5-1 and 5-2

Permittee Statement: “The sand trap formerly utilized at the property is no longer receiving waste water from the wash rack. Cannon AFB [Air Force Base] personnel indicated the drain is connected to the Base sanitary sewer system but could not provide any as-built drawings for the connection.”

NMED Comment: Section 4.6, Site Conceptual Exposure Model, indicates that SWMU 127 was comprised of a wash rack, a sand trap, an oil water separator, and two leach fields that received waste water from refueling vehicle wash operations. Additional information suggests the wash rack continues to be in use, but currently drains to the sanitary sewer. Additionally, Section 2.2, SW127 (SWMU 127) Description, unit specification information indicates the sand trap was a 2.5 by 4.5-foot structure that extended 3.5 feet below the pavement. Section 2.3.2, Phase II RCRA Facility Investigation information indicates samples were collected at the sand trap at the POL wash rack during the Phase II RFI, which is corroborated by the Figure 2-5 sample location information. Based on this information, the sand trap is located at the wash rack. The revised Report must include a complete and accurate account of current wash rack use including the location and disposition of the sand trap and all other surface and subsurface components associated with the former and current wash rack configuration.

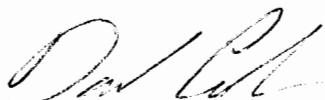
The Report currently suggests continued use of the wash rack to the present. If this is in fact the case, NMED will not be able to complete a corrective action complete determination for the site until the unit has been permanently decommissioned. Additional investigation of SWMU 127 will be required following the unit’s final decommissioning if additional information identifies potentially contaminated areas not characterized by prior site investigation.

Col. Hammons
October 25, 2018
Page 12

The Permittee must submit a revised Report that addresses all comments contained in this Disapproval. In addition, the Permittee must include a response letter that cross-references where NMED's numbered comments were addressed. The Permittee must also submit an electronic redline-strikeout version of the revised Report showing where all changes have been made to the Report. The revised Report must be submitted no later than **March 29, 2019**.

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

Sincerely,



John E. Kieling *for*
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED
B. Wear, NMED HWB
G. Acevedo, NMED HWB
L. King, EPA Region 6 (6MM-RC)
R. Lancaster, CAFB
S. Kottkamp, CAFB
M. Fuchs, CAFB
D. Canales, CAFB

File: CAFB 2018 and Reading, CAFB-17-010