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FACT SHEET / STATEMENT OF BASIS

Request for Corrective Action Complete Status for  
Six Solid Waste Management Units

*EPA ID Number NM7572124454*

**CANNON AIR FORCE BASE  
NEW MEXICO**

May 2017

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## **FACT SHEET / STATEMENT OF BASIS**

### **Proposals for Corrective Action Complete For Six Solid Waste Management Units at Cannon Air Force Base**

**EPA ID No. NM7572124454**

Under authority of the New Mexico Hazardous Waste Act (Section 74-4-1 *et seq.*, New Mexico Statutes Annotated (NMSA) 1978, as amended, 1992) and the New Mexico Hazardous Waste Management Regulations (20.4.1 [New Mexico Administrative Code] NMAC), the New Mexico Environment Department (NMED) intends to approve, pending public input into this decision, two combined Class 3 permit modification requests (PMRs) received from the United States Air Force Cannon Air Force Base (CAFB or Permittee) for the Resource Conservation and Recovery Act (RCRA) Hazardous Waste Corrective Action-only Permit (Permit) pursuant to 20.4.1.900 NMAC (incorporating 40 CFR § 270.42(c)).

If approved, the proposed modification would grant Corrective Action Complete (CAC) status for six Solid Waste Management Units (SWMUs 36a, 48A, 49, 111, 112, and 128) at CAFB. Currently, Table 1 in Permit Attachment I of CAFB's RCRA Permit lists SWMUs and Areas of Concern (AOCs) at CAFB where corrective action is required to characterize and remediate past releases of hazardous wastes or hazardous waste constituents. If this modification is approved by NMED, SWMUs 36a, 48A, 49, 111, 112, and 128 would be transferred from Table 1 of Permit Attachment I to Table 3 of Attachment I that lists SWMUs and AOCs with the status of Corrective Action Complete without Controls.

The Permittee is located at the following address: Cannon Air Force Base, 110 East Alison Avenue, Suite 1098, Cannon Air Force Base, New Mexico, 88103. The Permittee's primary contact for the action is: Colonel Douglas W. Gilpin, Commander, 27<sup>th</sup> Special Operations Mission Support Group.

#### **A. Facility Description**

Cannon Air Force Base is located in Curry County, New Mexico, approximately seven miles west of the City of Clovis and 15 miles north of the City of Portales. CAFB occupies approximately 4,320 acres in the Southern High Plains Physiographic Province. No streams exist on or near CAFB. Running Water Draw and Frio Draw, located approximately 10 and 20 miles north of CAFB, respectively, are the nearest streams. The majority of land surrounding CAFB is irrigated farmland and grazing land for beef and dairy cattle. CAFB dates to 1929, when Portair Field, a civilian passenger terminal, was established. In 1942, the Army Air Corps took control of the airfield and it became known as Clovis Army Air Base. In 1957, the Base became a permanent installation and was renamed Cannon Air Force Base. In June 2006, it was announced that CAFB would transfer from the Air Combat Command to Air Force Special Operations Command.

## **B. History of Investigation**

NMED issued Attachment I as part of the CAFB RCRA Permit in November 2003. The CAFB Permit requires corrective action to be conducted at the RCRA SWMUs and AOCs listed in Table 1 of Attachment I of the Permit. Section H below briefly describes the locations, histories, evaluations, and the basis for the determinations made for the AOCs and SWMUs proposed for corrective action complete without controls. More detailed descriptions of the AOCs and SWMUs can be found in the permit modification requests submitted by the Permittee and the references listed at the end of this fact sheet, which constitute the administrative record for this action.

## **C. Administrative Record**

The Administrative Record for this proposed action consists of the CAFB Fact Sheet/Statement of Basis, the Public Notice, the November 2003 Permit that contains Tables 1, 2, and 3, Class 3 Permit Modification Requests (PMRs) dated November 2015 and March 2016 with revised Permit Tables 1 through 3, and the referenced supporting documentation. The Administrative Record may be reviewed at the following location during the public comment period:

NMED – Hazardous Waste Bureau  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303  
(505) 476-6000  
*Monday - Friday from 8:00 a.m. to 5:00 p.m.*

A copy of the Fact Sheet/Statement of Basis, the Public Notice, and the November 2003 Permit that contains Tables 1, 2, and 3 of Attachment I and the Class 3 Permit Modification Requests dated November 2015 and March 2016 and revised Permit Tables 1 through 3 are also available electronically on the NMED website at:

<https://www.env.nm.gov/HWB/cafbperm.html>

To obtain a copy of the Administrative Record or a portion thereof, in addition to further information, please contact Ms. Pamela Allen at (505) 476-6000 at the address given above. NMED will provide copies, or portions thereof, of the administrative record at a cost to the requestor.

## **D. Public Participation**

Public meetings were arranged by the Permittee and held on January 6, 2016 (November 2015 proposals) and May 11, 2016 (March 2016 proposals) at the Clovis-Carver Public Library, 701 N. Main Street, Clovis NM 88101, in accordance with 20.4.1.901 NMAC as part of the 60-day public comment period on the PMRs required by the regulations at 40 CFR §270.42(c)(5). NMED did not receive any comments from the public during either comment period on the PMRs.

NMED issued a public notice on **May 31, 2017**, to announce the beginning of a 60-day comment period that will end at **5:00 p.m. MDT, July 30, 2017**. Any person who wishes to comment on this action or request a public hearing should submit written or electronic mail (e-mail) comment(s) with the commenter's name and address to the physical or e-mail address below. Only comments and/or requests received on or before **5:00 p.m. MDT, July 30, 2017** will be considered.

Dave Cobrain, Program Manager  
Hazardous Waste Bureau - New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505-6303  
Or via e-mail: [dave.cobrain@state.nm.us](mailto:dave.cobrain@state.nm.us)  
Ref: Proposals for CAC for 6 Sites at CAFB

Written comments must be based on the administrative record. Documents in the administrative record need not be re-submitted if expressly referenced by the commenter. Requests for a public hearing shall provide: (1) a clear and concise factual statement of the nature and scope of the interest of the person requesting the hearing; (2) the name and address of all persons whom the requestor represents; (3) a statement of any objections to the proposed action, including specific references; and (4) a statement of the issues which such persons propose to raise for consideration at the hearing. Written comments and requests for Public Hearing must be filed with Mr. Dave Cobrain on or before **5:00 p.m. MDT, July 30, 2017**. NMED will provide a thirty (30) day notice of a public hearing, if scheduled.

#### **E. Next Steps**

NMED will notify the Permittee and each person on the facility mailing list of the final decision. The final decision will become effective 30 days after service of the decision unless a later date is specified or unless review is required under New Mexico Hazardous Waste Regulations, 20.4.1.901.A NMAC.

#### **F. Contact Person for Additional Information**

For additional information, contact the following individual:

Dave Cobrain, Program Manager  
Hazardous Waste Bureau - New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505-6303  
Telephone: (505) 476-6055  
Fax: (505) 476-6030  
e-mail: [dave.cobrain@state.nm.us](mailto:dave.cobrain@state.nm.us)

## **G. Arrangements for Persons with Disabilities**

Any person with a disability and requiring assistance or auxiliary aid to participate in this process should contact Vincent Velarde, NMED, Room S-4303, P.O. Box 5469, 1190 St. Francis Drive, Santa Fe, New Mexico, 87502-6110. TDD or TDY users please access Mr. Velarde's number via the New Mexico Relay Network at 1-800-659-8331.

### **Non-Discrimination Statement**

NMED does not discriminate on the basis of race, color, national origin, disability, age or sex in the administration of its programs or activities, as required by applicable laws and regulations. NMED is responsible for coordination of compliance efforts and receipt of inquiries concerning non-discrimination requirements implemented by 40 C.F.R. Part 7, including Title VI of the Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972, and Section 13 of the Federal Water Pollution Control Act Amendments of 1972. If you have any questions about this notice or any of NMED's non-discrimination programs, policies or procedures, you may contact:

Kristine Pintado, Non-Discrimination Coordinator  
New Mexico Environment Department  
1190 St. Francis Dr., Suite N4050  
P.O. Box 5469  
Santa Fe, NM 87502  
(505) 827-2855  
[NMED.NDC@state.nm.us](mailto:NMED.NDC@state.nm.us)

If you believe that you have been discriminated against with respect to a NMED program or activity, you may contact the Non-Discrimination Coordinator identified above or visit our website at <https://www.env.nm.gov/non-employee-discrimination-complaint-page/> to learn how and where to file a complaint of discrimination.

## **H. Description of AOCs and SWMUs Proposed for Corrective Action Complete Without Controls**

### **1. SWMU 36a, Morale, Welfare, and Recreation (MWR) Auto Body Shop**

#### **Location**

SWMU 36a is located in the north central portion of CAFB. SWMU 36a was identified as an area approximately 72 feet southeast of the MWR Outdoor Recreation Center (Building 214).

## **History/Current and Anticipated Future Land Use**

SWMU 36a was an area of potentially contaminated soil discovered in 1994 near the current MWR Outdoor Recreation Center (formerly known as the Auto Hobby Shop). The potential contamination was discovered by a contractor who was preparing the area for the construction of a parking lot. The contamination was attributed to either the old MWR Auto Body Shop or the area's use as a disposal site for fluids from an aircraft engine maintenance shop in the early 1950s.

The site is currently covered by an asphalt parking lot. Current and future land use at SWMU 36a is expected to remain industrial for the foreseeable future.

## **Evaluation of Relevant Information - SWMU 36a**

One soil sample was collected at the time the soil contamination was discovered in 1994.

The soil sample was analyzed for volatile organic compounds (VOCs), benzene, toluene, ethylbenzene, xylene (BTEX), and a full Toxicity Characteristic Leaching Procedure (TCLP) suite of analyses. No chemicals of concern (COCs), except barium by TCLP, were detected. Based on the laboratory results, additional soil samples were not collected in 1994 (USAF, 1994).

A Corrective Measures Implementation (CMI) was carried out by the Permittee in 2008. During the CMI subsurface investigation phase, seven soil borings were drilled within the estimated horizontal and vertical extent of contamination. Soil samples were collected and analyzed for VOCs, semi-volatile organic compounds (SVOCs), total petroleum hydrocarbons (TPH) for Gasoline Range Organics (GRO), Diesel Range Organics (DRO), and Oil Range Organics (ORO), target analyte list (TAL) metals, pesticides, and polychlorinated biphenyls (PCBs). Chemical analysis of soil samples detected constituents only at concentrations below their respective NMED residential soil screening levels (SSLs) (URS, 2008). NMED's Approval with Direction response letter dated February 6, 2009 concurred with the findings of the CMI investigation findings for SWMU 36a (referred to as AOC 36) (NMED, 2008).

NMED provided comments of prior investigations conducted for SWMU 36a in a July 22, 2010 letter, which documented the conclusions of a Tier 1 risk screening evaluation conducted by NMED of soil sample analysis results for SWMU 36a. NMED's evaluation found that none of the chemicals or metals that were detected to depths of ten feet below ground surface in soil posed an unacceptable risk to human health. However, barium was identified as a potential contaminant of concern for ecological receptors. Further evaluation indicated that barium only slightly exceeded the established site specific background metals concentration for barium in one of fourteen samples collected during previous investigations (NMED, 2010a). SWMU36a is currently covered with asphalt and therefore, is not a viable ecological habitat at this time.

## **Basis of Determination**

Based on the completed site investigation activities and evaluation of the collected assessment information, identified impacts at SWMU 36a do not pose an unacceptable level of risk to human health or the environment. Therefore, SWMU 36a is granted Corrective Action Complete without Controls status.

## **2. SWMU 48A, Underground Waste Oil Tank**

### **Location**

SWMU 48A is a former 20,000-gallon underground storage tank (UST) located in the northeast portion of CAFB at the former location of Area 4028 (former fueling station). SWMU 48A is located in the northwest portion of the parking lot for Building 195 southeast of the intersection between Kermit Evans Avenue and Chindit Boulevard.

### **History/Current and Anticipated Future Land Use**

SWMU 48A was first identified as a 20,000-gallon UST during the 1987 CAFB RCRA Facility Assessment (RFA) (A.T. Kearney, Inc., 1987). The tank was estimated to be in use from 1941 until 1985. This UST served as a gasoline refueling tank from 1941 to 1965 and a storage tank for waste fuel, oil, spent solvents, paint thinners, recovered fuels, engine oil, hydraulic fluid, and stripper from 1965 to 1985. The tank and all associated piping were removed in 1988 (Cannon AFB & AFCEC, 2014).

It is anticipated that the land use will remain industrial at SWMU 48A for the foreseeable future.

### **Evaluation of Relevant Information - SWMU 48A**

SWMU 48A was included in a 1994 Phase I RCRA Facility Investigation (RFI). As part of the investigation, five soil borings were advanced. Surface and subsurface soil samples were collected and analyzed for BTEX, TAL metals, cyanide, and VOCs. VOCs were detected in soil samples along with various metals; however, the detected concentrations were below NMED's residential SSLs.

During a subsequent 1997 Phase II RFI, five additional soil borings were advanced at the site. Soil samples were collected and analyzed for VOCs, SVOCs, TAL metals, and TPH. The results of analysis of the soil samples indicated the SVOC constituent bis(2-ethylhexyl)phthalate and TPH were present in surface soils, but at concentrations below NMED's residential SSLs. Concentrations of VOCs, SVOCs, metals, and TPH were detected in samples obtained from subsurface soils. All detected concentrations were below NMED's residential SSLs with the exception of TPH, which was detected in some of the samples at concentrations above NMED's residential and industrial SSLs (Woodward-Clyde, 1997).

A Corrective Measures Study (CMS) for SWMU 48A was completed in 2000, which evaluated the potential human health and ecological risks associated with the SWMU. The risk assessment

evaluated data from the 1994 and 1997 assessments. Results of the Tier 1 risk assessment indicated that there was minimal risk to human health and the environment. A “No Further Action” corrective measure alternative was recommended for SWMU 48A (URS, 2000). However, the detected TPH concentrations above NMED SSLs were not considered during the risk assessment.

A 2008 CMI included the collection of additional soil samples to aid in the delineation of contamination. Seven additional soil borings were advanced around the perimeter of the former UST location. One boring was placed near the Phase II RFI boring with the highest TPH detection. Soil samples were analyzed for VOCs, SVOCs, metals, pesticides, PCB, and TPH. The results of soil sample analysis indicated COC concentrations were below respective NMED residential SSLs (URS, 2008). However, NMED issued an Approval with Direction for the CMI report requiring additional investigation and cleanup activities at SWMU 48A. The Permittee was directed to complete additional sampling to address the locations where TPH was present at concentrations above NMED’s TPH SSLs that were not addressed during the CMI field investigation (NMED, 2009).

In 2010, a CMI Work Plan Addendum was completed to meet the requirements of NMED’s 2009 Approval with Direction. The proposed scope of work included soil trenching at the location where TPH concentrations had been previously documented above NMED SSLs. The CMI Addendum field work was performed in 2010 and included removal of contaminated soils and confirmation soil sampling. The confirmation soil samples were analyzed for BTEX, naphthalene, PAHs, TPH diesel-range organics (DRO), TPH gasoline-range organics (GRO), and TPH oil-range organics (ORO). The confirmation sample chemical analytical results indicated that soils containing PAHs, TPH GRO, and naphthalene were removed from the site (URS, 2010). NMED issued a Notice of Approval for the CMI Site Closure Report Addendum. However, NMED did not grant CAC status for SWMU 48A based on the continued presence of soil containing TPH concentrations above NMED’s industrial and residential SSLs for direct exposure to unknown oil via soil ingestion. NMED did not require further investigation due to site use as an asphalt covered parking lot (NMED, 2010b).

In 2013, the Permittee began to review Installation Restoration Program (IRP) sites to determine ways to reach closure at previously investigated SWMUs. The Permittee reviewed all soil analysis data for the site against NMED’s 2012 SSLs for TPH. Several soil sample analysis results were found to exceed the residential and industrial SSL for TPH. In order to resolve the exceedances, the Permittee calculated 95% Upper Confidence Limit (UCL) concentration values for TPH data collected from prior investigation activities. Three 95% UCLs were calculated for the site TPH data set. All calculated 95% UCL concentration values were below the NMED residential and industrial SSLs (Cannon AFB & AFCEC, 2014). NMED Approved the risk assessment in its September 5, 2014 response letter.



### **Basis of Determination**

Based on the completed site investigation and risk assessment, COCs in soil at SWMU 48A do not pose an unacceptable level of risk to human health or the environment. Therefore, SWMU 48A is granted Corrective Action Complete without Controls status.

### **3. SWMU 49 Inactive Petroleum Oil Lubricant (POL) Storage Tank No. 4028a**

#### **Location**

SWMU 49 is documented as a former 20,000-gallon POL UST located in the northeast portion of CAFB at the former location of Area 4028 (A.T. Kearney, Inc., 1987). SWMU 49 was reported to be located in the northwest portion of the parking lot for Building 195 southeast of the intersection between Kermit Evans Avenue and Chindit Boulevard. The tank may have been a 500-gallon diesel UST removed in 1988.

#### **History/Current and Anticipated Future Land Use**

Based on prior investigation and historical document review, it was believed that SWMU 49 never existed as an individual site and has previously been associated with three documented storage tanks at Area 4028 which may have included two 20,000-gallon USTs and a 2,000-gallon overflow aboveground storage tank. However, after review of historical documentation it was determined that no previous investigations had been performed for SWMU 49. Investigation activities of contamination at Area 4028 also revealed a level of uncertainty with the distinction between the storage tanks documented as SWMU 48A and 48B and the storage tank documented as SWMU 49. As a result of this uncertainty, a final status determination was delayed for SWMU 49 pending results of the investigation at SWMU 48A in accordance with an Approval with Direction issued by NMED (NMED, 2008).

It is anticipated that the land use will remain industrial at SWMU 49 for the foreseeable future.

#### **Evaluation of Relevant Information – SWMU 49**

The investigation conducted for SWMU 48A encompassed the location of SWMU 49. The results of the investigations and risk assessment completed at SWMUs 48A and 49 indicate that impacts from COCs at Area 4028, including TPH, do not pose an unacceptable level of risk to human health or the environment.

#### **Basis of Determination**

SWMU 49 is granted a Corrective Action Complete without Controls status based on the results of the site investigations and risk assessment, which indicate that impacts from COCs at Area 4028 do not pose an unacceptable level of risk to human health or the environment.

#### **4. SWMU 111, Unlined Pit**

##### **Location**

SWMU 111 is located at Fire Training Area No. 4 (FTA4) near the southeast corner of CAFB, approximately 2,000 feet southeast of the southern end of Runway 31.

##### **History/Current and Anticipated Future Land Use**

SWMU 111, Unlined Pit is part of FTA4 which is comprised of SWMU 109, Fire Department Training Area No. 4; SWMU 110, UST No. 2336; and SWMU 112, oil water separator (OWS) No. 2336. SWMU 109 was historically utilized as a fuel truck cleaning area between 1961 and 1974. An estimated 3,000 to 4,000 gallons of fuel percolated into the ground at SWMU 109 as a result of the fuel truck cleaning activities (Walk, 1990). In 1974, SWMU 109 was activated as FTA4. Waste oils, solvents, and recovered JP-4 were burned during fire training activities conducted at FTA4 from 1974 to 1975. Recovered JP-4 was utilized as the sole fuel source for all fire training exercises conducted at SWMU 109 from 1975 to 1995 (Harza, 1997).

During use as a fire training area, a 40-foot by 70-foot concrete-lined pit surrounded by a 4-foot tall earthen berm was constructed (SWMU 109). The pit was filled with gravel, and a mock airplane was located in the center of the pit. Runoff from the fire training area was originally collected in an unlined pit (SWMU 111) located northeast of SWMU 109. SWMU 111 was backfilled in 1985 when an OWS (SWMU 112) was installed to replace SWMU 111.

It is anticipated that the land use will remain industrial at SWMU 111 for the foreseeable future.

##### **Evaluation of Relevant Information**

A Remedial Investigation (RI) conducted in 1988 addressed the UST located in FTA4 (SWMU 110) that was suspected of leaking, as well as the runoff collection area (SWMU 111) at FTA4. During the investigation three soil borings were advanced near SWMU 111. Soil samples collected from the borings were analyzed for VOCs and metals; however, samples were not analyzed for TPH. VOCs were not detected in the soil samples collected from the soil borings. Detected concentrations of barium, cadmium, chromium, lead, mercury, selenium, and silver were below NMED residential SSLs. Arsenic concentrations exceeded the residential SSL at all three boring locations (Walk, 1990).

An additional RI was conducted in 1991 to evaluate the nature and extent of contamination present at FTA4. During the investigation, two soil borings were completed near the southeastern corner of SWMU 111. Soil samples were collected and analyzed for VOCs, TPH, lead, and chromium. TPH, xylenes, lead, and chromium were detected at concentrations below the NMED residential SSLs (Woodward-Clyde, 1992).

During a 1997 Phase II RFI, nineteen soil borings were completed to delineate the nature and extent of contamination at FTA4. Soil samples were collected and analyzed for VOCs, SVOCs, cyanide, TAL metals, and TPH. Two additional soil borings were advanced to delineate contamination at SWMUs 111 and 112 near the center and to the northeast of the unlined pit, respectively. VOCs, SVOCs, and cyanide were not detected in the soil samples collected from the borings. All concentrations of metals detected in the samples were below NMED residential SSLs. The maximum detected TPH concentration was above NMED's residential SSL, but below the industrial SSL (Harza, 1997).

During a Phase I Soil Investigation for FTA4 conducted in 2004, thirteen soil borings were advanced to confirm the presence of TPH soil contamination at and within the vicinity of SWMU 109. One of the thirteen soil borings CAFB-SB14 was located in SWMUs 111/112 to reevaluate the 1997 RFI sample results. TPH was not detected in any of the samples collected from the boring. However, after further review, it was determined that the boring location did not correspond to the original sample location (TN & Associates, 2005).

Additional resampling was completed at SWMUs 111/112 in November 2014. The objective of the sampling was to obtain confirmation samples for TPH and arsenic from selected boring locations at and in the vicinity of SWMUs 111/112 which exceeded their respective residential SSLs during prior assessment. The results of the resampling were provided in a Status Report. The results indicated TPH concentrations were no longer present above NMED's residential SSLs at boring location SB14. Additionally, arsenic concentrations were also below NMED's residential SSL at the resampled B9 boring location (URS 2015).

### **Basis of Determination**

Based on the final results of assessment activities for SWMU 111, identified COC concentrations do not pose an unacceptable level of risk to human health or the environment. Therefore, SWMU 111 is granted Corrective Action Complete without Controls status.

## **5. SWMU 112, OWS No. 2336**

### **Location**

SWMU 112 is a former OWS that was located in FTA4 near the southeast corner of CAFB, approximately 2,000 feet southeast of the southern end of Runway 31.

### **History/Current and Anticipated Future Land Use**

SWMU 112 is part of FTA4, which consists of SWMU 109, Fire Department Training Area No. 4; SWMU 110, UST No. 2336; and SWMU 111, Unlined Pit. Waste oils, solvents, and recovered JP-4 were burned during fire training activities at FTA4 from 1974 to 1975. Recovered JP-4 was utilized as the sole fuel source for all fire training exercises conducted at SWMU 109 from 1975 to 1995 (Harza, 1997). Runoff from the fire training area was originally collected in an unlined pit

(SWMU 111) located northeast of SWMU 109. SWMU 111 was backfilled in 1985 when SWMU 112 was installed.

It is anticipated that the land use will remain industrial at SWMU 112 for the foreseeable future.

### **Evaluation of Relevant Information – SWMU 112**

Investigations conducted at FTA4, which have included sampling and resampling in the vicinity of, and at, the former location of SWMUs 111 and 112, identified residual TPH and arsenic concentrations above NMED residential SSLs (see Item 4 Evaluation of Relevant Information). Final resampling activities conducted in 2014 to address these exceedances indicated the COCs were not present at concentrations above NMED's residential SSLs (URS, 2015). All other COCs detected during prior investigations conducted at SWMU 111 and 112 were either not detected or the reported concentrations were below residential SSLs.

### **Basis of Determination**

Based on the final results of assessment activities for SWMU 111/112, identified COC concentrations do not pose an unacceptable level of risk to human health or the environment. Therefore, SWMU 112 is granted Corrective Action Complete without Controls status.

## **6. SWMU 128, OWS near Tank 4095 (No. 2) and Leach field**

### **Location**

SWMU 128 is located in the north central portion of CAFB to the south of Building 223.

### **History/Current and Anticipated Future Land Use**

SWMU 128 was defined in the original 1987 RFA for CAFB as an OWS near tank 4095 (No. 2). The RFA identified an OWS and UST at this location. Similarly, SWMU 127 was identified as an OWS near tank 4095 (No. 1) at the same location (A.T. Kearny, Inc., 1987).

CAFB Area 4095 originally consisted of a 135-gallon concrete sand trap and leach field that received wash water from the POL refueling truck wash rack. The sand trap and leach field were first used in 1977. The sand trap discharged to a rectangular leach field located approximately ten feet northeast of the wash rack. The original leach field became inactive in the 1980s and was bypassed in 1991. Additionally, an OWS enclosed in a concrete vault was installed in line with the wash-rack's drain pipe downstream from the sand trap and use of the original leach field and sand trap was discontinued. After the OWS and new leach field were installed, the wastewater from the OWS discharged to a new leach field located approximately 20 feet northeast of the initial leach field location. Recovered petroleum products such as jet propellant, type 4 fuel, and oil and grease accumulated in the OWS prior to removal for recycling (CAFB, 2015).

During prior evaluation, SWMU 127 had been identified as the wash rack, the old and new leach fields, the OWS, and sand trap at Area 4095 (CAFB, 2015). No other OWS has been identified at Area 4095. Furthermore, all contamination associated with Area 4095 has been addressed under assessment and evaluation activities for SWMU 127; therefore, SWMU 128 appears to be a redundant unit.

#### **Evaluation of Relevant Information – SWMU 128**

CAFB Area 4095 has been investigated as part of various site assessments under SWMU 127 between 1988 and 2014. SWMU 128 appears to be a duplicate of SWMU 127.

#### **Basis of Determination**

Due to this identified duplication, SWMU 128 will be moved to Table 3 (Corrective Action Complete Without Controls) in Attachment I of the Permit.

## References:

- A.T. Kearny, Inc. 1987. Preliminary Review/VSI Report RCRA Facility Assessment. Cannon Air Force Base, Clovis, New Mexico. July
- Cannon AFB & AFCEC. 2014. Development of an Upper Confidence Limit Solid Waste Management Units 48A and 49 (ST-26). Cannon Air Force Base, Clovis New Mexico. April.
- CAFB. 2015. Cannon Air Force Base, Status of Solid Waste Management Unit 128, Cannon Air Force Base, New Mexico. March.
- Harza. 1997. Harza Environmental Services, Phase II RCRA Facility Investigation Report, Fire Training Area No. 4. Cannon Air Force Base, New Mexico. August.
- NMED. 2015a. New Mexico Environment Department Risk Assessment Guidance for Site Investigations and Remediation. Cannon Air Force Base, New Mexico. July.
- NMED. 2015b. Email correspondence between Laura Peters of Cannon Air Force Base and Naomi Davidson of New Mexico Environment Department. Cannon Air Force Base, New Mexico. March/April.
- NMED. 2015c. Approval with Direction SWMU 111/112 Status Report. Cannon Air Force Base, New Mexico. September.
- NMED. 2014. Approval Development of a 95% Upper Confidence Level, Solid Waste Management Units 48A and 49 (ST-26). Cannon Air Force Base, New Mexico. February.
- NMED. 2010a. Review of AOC 36 Status. Cannon Air Force Base, New Mexico. February.
- NMED. 2010b. Notice of Approval Site ST-26 (SWMU 48A) Corrective Measure Implementation (CMI) Site Closure Report Addendum May 2010. Cannon Air Force Base, New Mexico. August.
- NMED. 2008. Approval with Direction RCRA Facility Investigation For 21 SWMUs. Cannon Air Force Base, New Mexico. May.
- NMED. 2009. Approval with Direction Final Site ST-26 (SWMU 48A and AOC 36) Corrective Measure Implementation (CMI) Site Closure Report. Cannon Air Force Base, New Mexico. February.
- NMED. 2003. Cannon Air Force Base Hazardous Waste Permit, EPA ID No. NM7572124454-1. Cannon Air Force Base, New Mexico. October.
- TN & Associates. 2005. Phase I Investigation, Soil Corrective Measures, Fire Training Area 04, Cannon Air Force Base, New Mexico. January.

- URS. 2000. URS Group, Inc., Corrective Measures Study (CMS) at SWMUs 31, 48A, 77, and 127. Cannon Air Force Base, New Mexico. June.
- URS. 2006. URS Group, Inc., RCRA Facility Investigation for 21 SWMUs. Cannon AFB, New Mexico. October.
- URS. 2008. URS Group, Inc., Corrective Measure Implementation Site Closure Report for Site ST-26 (SWMU 48A) and AOC 36. Cannon Air Force Base, New Mexico. October.
- URS. 2010. URS Group, Inc., Corrective Measure Implementation Site Closure Report Addendum for Site ST-26 (SWMU 48A). Cannon Air Force Base, New Mexico. May.
- URS. 2015. URS Group, Inc., SWMU 111/112 Status Report. Cannon Air Force Base, New Mexico. June.
- USAF. 1994. Letter to William K. Honker, Chief of RCRA Permits Branch, USEPA Region VII regarding Possible Contamination on Base. April.
- Walk. 1990. Walk, Haydel & Associates, Installation Restoration Program, Remedial Investigation Report. Cannon Air Force Base, New Mexico.
- Woodward-Clyde. 1997. RCRA Facility Investigation, Appendix II SWMUs – Phase II. Cannon Air Force Base, New Mexico. November.
- Woodward-Clyde. 1992. Remedial Investigation Report for 18 Solid Waste Management Units. Cannon Air Force Base, New Mexico. November.