Dear Colonel Hammons:

The New Mexico Environment Department (NMED) has received Cannon Air Force Base’s (Permittee) document titled *Site Inspection of Aqueous Film Forming Foam (AFFF) Release Areas Environmental Programs Worldwide Installation-Specific Work Plan* (Work Plan), dated July 26, 2017. NMED reviewed the Work Plan and provides the following comments which must be addressed during sampling activities.

**COMMENTS**

1. **Additional Sampling and Data Evaluation Requirements**

   **NMED Comment:** To ensure that sample data provides more comprehensive information, the following additional sampling requirements must be implemented during the proposed investigation:
a. In addition to the proposed surface soil and soil boring end depth sample collection at each proposed boring location, samples must also be collected within the three to five feet below ground surface (bgs) sample interval, or as warranted below non-native fill materials associated with prior cleanup activities. The additional required samples must be analyzed for per-and polyfluorinated alkyl substances (PFASs).

b. Three additional soil borings must be advanced within the fire training area adjacent to the lined burn pit and mock aircraft fire training obstacle at the Active Fire Training Area (AFFF Release Area 11). The additional borings must be advanced to a depth of twenty-five feet bgs.

c. Groundwater samples must also be collected and analyzed for PFASs at newly installed replacement groundwater monitoring wells MW-Ca, MW-Fa, MW-Ga, MW-Sa, MW-Ta, and MW-Ua.

d. Updated (June 2017) United States Environmental Protection Agency Regional Screening Levels (EPA RSLs) for perfluorobutanesulfonic acid are available for residential soil (1,300 milligrams per kilogram (mg/kg)), industrial soil (16,000 mg/kg), and tap water (400 micrograms per liter). Sample analysis data must be evaluated against the most up to date EPA RSL values.

The additional soil and groundwater sample collection will provide important additional information regarding the sites to be investigated at Cannon Air Force Base for identified AFFF contaminants across the facility.
If you have any questions regarding this letter, please contact Gabriel Acevedo at (505) 476-6043.

Sincerely,

[Signature]

John E. Kieling
Chief
Hazardous Waste Bureau

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