



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](http://www.env.nm.gov)



BUTCH TONGATE  
Cabinet Secretary  
J. C. BORREGO  
Deputy Secretary

ENTERED

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

September 15, 2017

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

**RE: SITE INSPECTION OF AQUEOUS FILM FORMING FOAM (AFFF)  
RELEASE AREAS ENVIRONMENTAL PROGRAMS WORLDWIDE  
INSTALLATION-SPECIFIC WORK PLAN  
CANNON AIR FORCE BASE, NEW MEXICO  
EPA ID #NM7572124454  
HWB-CAFB-MISC**

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:

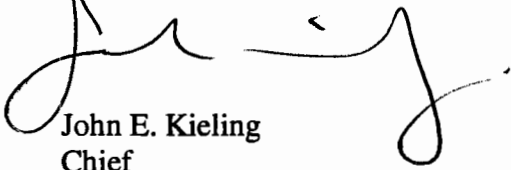
- a. In addition to the proposed surface soil and soil boring end depth sample collection at each proposed boring location, samples must also be collected within the three to five feet below ground surface (bgs) sample interval, or as warranted below non-native fill materials associated with prior cleanup 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.

Colonel Gilpin  
September 15, 2017  
Page 3

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

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kieling". The signature is fluid and cursive, with a large initial "J" and a long horizontal stroke.

John E. Kieling  
Chief  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
B. Wear, NMED HWB  
G. Acevedo, NMED HWB  
A. Lafuente, CAFB  
R. Lancaster, CAFB  
S. Kottkamp, CAFB  
S. Palmer, CAFB

File: CAFB 2017 and Reading, CAFB-MISC