

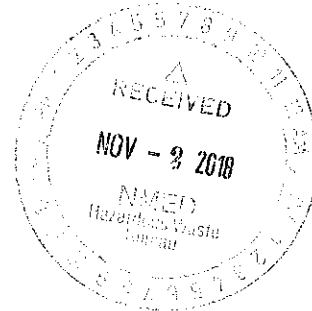


DEPARTMENT OF THE AIR FORCE
AIR FORCE CIVIL ENGINEER CENTER
JOINT BASE SAN ANTONIO LACKLAND TEXAS

ENTERED

26 Oct 18

Ms. Suzanne W. Bilbrey
Director
Environmental Management
Air Force Civil Engineer Center
3515 S General McMullen
San Antonio TX 78226-1710



Ms. Michelle Hunter, Bureau Chief
Ground Water Quality Bureau (GWQB)
New Mexico Environment Department (NMED)
2905 Rodeo Park Drive East, Building 1
Santa Fe NM 87505-6303

Dear Ms. Hunter

This letter responds to NMED's September 26, 2018, response to a site inspection report (SI Report) the Air Force shared with the GWQB regarding sampling per-and poly-fluoroalkyl substances (PFAS) in soils and groundwater at Cannon Air Force Base.

The following addresses the conditions described on page 2 of the September 26, 2018, letter that are associated with the Water Quality Control Commission regulation at 20.6.2.1203.A(7) New Mexico Administrative Code (NMAC):

1. The Air Force appreciates NMED's recommendation to amend the SI Report to state that PFAS compounds were found at low levels in some samples. However, the Air Force declines to follow that recommendation. The Air Force is assessing and investigating contamination of drinking water sources from PFOS and PFOA releases during firefighting activities at Cannon Air Force Base in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA, 42 United States Code Sections 9601 to 9675) and the National Oil and Hazardous Substances Pollution Contingency Plan (National Contingency Plan, 40 Code of Federal Regulations Part 300). As such, the SI focused on the PFAS constituents that have toxicity values and the contents of the SI Report center around the United States Environmental Protection Agency's (EPA's) established lifetime health advisories (LHAs) for PFOS and PFOA in drinking water. In addition, please note that the sampling of on base drinking water wells was independent of the SI.
2. The Air Force is grateful for NMED's prompt review for determining administrative completeness of the SI Report. The Air Force looks forward to the department's technical review on the SI Report.

The following responds to NMED's directions on pages 2 and 3 of the letter regarding corrective actions pursuant to 20.6.2.1203.A(5) NMAC:

1. When the Air Force detects PFOS/PFOA contamination in drinking water at levels above the EPA LHAs, it proceeds to delineate and mitigate human drinking water exposures. When a drinking water source is above the EPA's LHA of 70 parts per trillion (ppt) for PFOS/PFOA, the Air Force offers and provides alternative drinking water pursuant to residential needs (e.g., bottled water, filtration, connecting to municipal water). Drinking water sources that are between 35 and 70 ppt are monitored quarterly for one year and annually for an additional two years to determine if a trend exists and to take appropriate action (i.e., mitigation, further monitoring, or end monitoring). Drinking water sources that are less than 35 ppt require no further monitoring. Drinking water sources that exceed the LHA will be routinely monitored as part of the filtration system (when installed) to ensure proper operation and removal efficiency.

Upon data validation of PFOS/PFOA concentration(s) in groundwater monitoring wells above the EPA's LHA on Cannon Air Force Base, the Air Force began initial reconnaissance with potentially impacted owners of off-site drinking water supply wells, including distribution of fact sheets, notification letters, and well sampling authorization forms. Distribution of the referenced materials was personally delivered to owners of off-site wells by the Base Civil Engineer and the Air Force Installation Support Section. The Air Force mobilized the expanded SI the week of August 27, 2018, to address the potential off-site migration. A total of 19 samples from drinking water supply wells were acquired during the initial effort and notification letters regarding analytical results were provided to owners of all off-site drinking water supply wells sampled during the initial phase. Distribution of the analytical results from the initial sampling effort began on September 13, 2018. The Air Force immediately arranged for the distribution of alternative water supply to off-site well owners exceeding the EPA LHA. During the expanded SI follow-on effort conducted the week of September 24, 2018, outstanding authorization forms were collected and subsequent sampling was performed. Six additional samples were obtained during the remobilization of the expanded SI. The Air Force will be able to share the validated results with impacted drinking water supply well owners and NMED no later than November 10, 2018. As discussed at the October 18, 2018 meeting, sampling is guided by scientific/technical rationale (i.e., ground water directional flow down gradient from the release site).

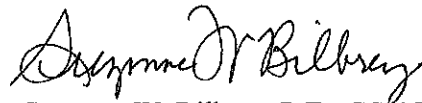
2. The Air Force's investigation work and mitigation actions are guided by CERCLA, applicable state laws and the EPA LHA levels of 70 ppt. The Air Force is currently sampling PFOS and PFOA, which have an established EPA LHA. To the extent other constituents' data are available, the Air Force will share the results.
3. Re-sampling of on-base drinking water supplies was completed on October 10, 2018. Analytical results will be shared with NMED, once final Air Force analytical validation is complete.

Once applicable standards have been established, remedial/hydrogeologic investigations will be prioritized based on risk to human health and the environment on a national basis. The highest risk sites will be investigated first. Ratings of relative risk to human health, and the environment will be utilized to prioritize investigations. The Air Force is in the process of programming out-year requirements.

4. Immediately upon receipt of the preliminary analytical results from the initial off-site sampling effort, the Air Force arranged for the distribution of alternative water supply on September 13, 2018, to off-site well owners exceeding the EPA LHA. The Air Force continues to offer and provide alternative drinking water pursuant to residential needs.

If you have any questions or concerns, please contact Mr. Sheen Kottkamp, of the Air Force Civil Engineer Center (AFCEC/CZOW), at (505) 846-9017 or sheen.kottkamp.@us.af.mil.

Sincerely



Suzanne W. Bilbrey, P.E., GS-15, DAF
Director

cc:

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