



CAFB
SWMU 109

Cobrain, Dave, NMENV

From: KOTTKAMP, SHEEN T GS-12 USAF AFCEC AFCEC/CZOW <sheen.kottkamp.1@us.af.mil>
Sent: Tuesday, March 12, 2019 9:40 AM
To: Acevedo, Gabriel, NMENV; GIERKE, CHRISTIPHER N GS-12 USAF AFCEC 27 SOCES/AFCEC/CZO
Cc: Wear, Benjamin, NMENV; Cobrain, Dave, NMENV; FUCHS, MARK J CTR USAF AFSOC 27 SOCES/CEIER; SEGURA, CHRISTOPHER G GS-14 USAF AFCEC/CZO; Kieling, John, NMENV
Subject: [EXT] RE: SWMU 109 RFI Work Plan Questions

Good morning Gabe,

In response to the communication below, it is our intent to move forward with the work plan to address the hydrocarbon impact related to historic fire training activities associated with the site. As you know, the Air Force has appealed some provisions of the recently issued Cannon AFB RCRA permit, to include provisions that address releases of PFAS. Until the appeal is resolved, the Air Force cannot investigate most PFAS compounds. However, the Air Force can address the current constituents of concern at the site as determined by the completion of the RFI component and continue to move the site forward. It is my goal to continue to move forward with the execution of the restoration program despite the challenges the "emerging" PFAS constituents present. We have incorporated and made the appropriate changes to the work plan regarding the hydrocarbon impact in relation to the new February 2019 guidance. Please inform me if you concur with this path forward at this time. The current time on target date for submission of the work plan to NMED is 14 March 2019.

Hope all is well. Sheen

From: Acevedo, Gabriel, NMENV <Gabriel.Acevedo@state.nm.us>
Sent: Tuesday, March 5, 2019 3:26 PM
To: GIERKE, CHRISTIPHER N GS-12 USAF AFCEC 27 SOCES/AFCEC/CZO <christipher.gierke@us.af.mil>
Cc: Wear, Benjamin, NMENV <Benjamin.Wear@state.nm.us>; Cobrain, Dave, NMENV <dave.cobrain@state.nm.us>; FUCHS, MARK J CTR USAF AFSOC 27 SOCES/CEIER <mark.fuchs.ctr@us.af.mil>; SEGURA, CHRISTOPHER G GS-14 USAF AFCEC/CZO <christopher.segura.2@us.af.mil>; KOTTKAMP, SHEEN T GS-12 USAF AFCEC AFCEC/CZOW <sheen.kottkamp.1@us.af.mil>; Kieling, John, NMENV <john.kieling@state.nm.us>
Subject: [Non-DoD Source] RE: SWMU 109 RFI Work Plan Questions

Christipher,

Since work is ongoing and the work plan has not yet been submitted, the 2019 Risk Assessment Guidance will apply. With regard to PFAS, perfluorinated compounds were included in NMED's 2017 guidance as well as in the updated guidance. Perfluorinated compounds also are referenced in the renewed CAFB permit. It is not a good use of resources to investigate for only a partial list of contaminants of concern at any site; therefore, conducting a full investigation of SWMU 109 rather than a partial investigation would likely result in significant cost savings for the Air Force. The work plan should include PFAS as constituents of concern at the site. It's appropriate for the Air Force to request an extension for submittal of the work plan to include updates based on the 2019 Risk Assessment Guidance.

From: GIERKE, CHRISTIPHER N GS-12 USAF AFCEC 27 SOCES/AFCEC/CZO <christipher.gierke@us.af.mil>
Sent: Friday, March 01, 2019 11:53 AM
To: Acevedo, Gabriel, NMENV <Gabriel.Acevedo@state.nm.us>
Cc: Wear, Benjamin, NMENV <Benjamin.Wear@state.nm.us>; Cobrain, Dave, NMENV <dave.cobrain@state.nm.us>; FUCHS, MARK J CTR USAF AFSOC 27 SOCES/CEIER <mark.fuchs.ctr@us.af.mil>; SEGURA, CHRISTOPHER G GS-14 USAF AFCEC/CZO <christopher.segura.2@us.af.mil>; KOTTKAMP, SHEEN T GS-12 USAF AFCEC AFCEC/CZOW <sheen.kottkamp.1@us.af.mil>
Subject: [EXT] SWMU 109 RFI Work Plan Questions

Good morning Mr. Acevedo,

I wanted to reach out to you in regards to the new Feb 2019 "Guidance for Site Investigations and Remediation, Volume 1" and how it will affect the SWMU 109 RFI Work Plan. We currently have the plan in the staffing process for a Command signature transmittal letter. The work plan was completed with the prior 2017 guidance. We are having the plan reviewed and updated with respect to the new guidance, but depending on the amount of changes required, it may warrant us to file an additional extension request. The current time on target date for submission to NMED is 14 March 2019. Would this be acceptable if additional time is required?

Also I would like to get your thoughts on the new guidance, specifically in reference to Volume 1, Table 5-3 Preliminary Screening Levels for Select PFAS. Due to their "emerging contaminant" status, it is important to note that addressing PFAS constituents is not under the current scope of work of the Performance Base Remediation Contract. Within the current SWMU 109 Work Plan Section 1.2 it states "Due to the fact that PFAS are emerging contaminants, future investigations for PFAS at Cannon AFB (including SWMU 109) will be completed independently of this RFI by AFCEC. Analytes of concern for this RFI are limited to those addressed in the New Mexico Environment Department (NMED) Risk Assessment Guidance for Site Investigations and Remediation (NMED 2017a)."

Any guidance or direction you could provide would be well received. In addition, if you and your leadership are interested in arranging a quick telecon for introductions please let me know. I would invite Sheen in on that call as well. Thank you.

V/R
Christipher Gierke
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