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NEW MEXICO ENVIRONMENT DEPARTMENT **ENTERED**

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James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 4, 2019

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

**RE: REQUEST FOR INFORMATION
CANNON AIR FORCE BASE, NEW MEXICO
EPA ID #NM7572124454**

Dear Col. Hammons:

Pursuant to section 74-4-4.3.A of the New Mexico Hazardous Waste Act (“HWA”), NMSA 1978, sections 74-4-1 to 74-4-14, the New Mexico Environment Department (“NMED”) hereby requests that the U.S. Air Force, owner and operator of Cannon Air Force Base (the “Air Force” or “Permittee”), provide to NMED the information listed below concerning the release of the emerging contaminants Per- and Poly-Fluoroalkyl Substances (“PFAS”) to the environment in association with facility-wide operations at Cannon Air Force Base (“CAFB”).

Section 74-4-4.3.A of the HWA provides that “[f]or the purposes of developing or assisting in the development of any rules, conducting any study, taking any corrective action or enforcing the provisions of the Hazardous Waste Act, upon request of the secretary or his authorized representative: any person who generates, stores, treats, transports, disposes of or otherwise handles or has handled hazardous wastes shall furnish information relating to such hazardous wastes. . . .”

The Air Force completed a site inspection at CAFB to assess any potential impacts to soil, sediment, surface water, and groundwater at CAFB from PFAS. The resulting August 2018 *Final Site Inspection Report, Site Inspection of Aqueous Film Forming Foam (AFFF) Release Areas Environmental Programs Worldwide* (“AFFF Site Inspection Report”) indicated that

PFAS were detected in soil, surface water, and sediment at various sampled locations at CAFB and in groundwater. PFAS was detected and reported in the AFFF Site Inspection Report provide to NMED by the Permittee in groundwater at the eastern and southeastern portions of the CAFB at various locations above the United States Environmental Protection Agency Health Advisory level of 0.07 micrograms per liter ($\mu\text{g/L}$). In accordance with NMAC 20.6.2.1203(A) the Permittee notified NMED of a release of PFAS to groundwater in association with the historic use of AFFF used during historic firefighter training activities. Perfluorinated compounds are referenced in a CAFB study and in the NMED Risk Assessment Guidance for Site Investigations and Remediation. Due to their unique properties, PFAS are a useful indicator for characterizing groundwater migration pathways and other aquifer parameters. In order for NMED to better understand subsurface conditions related to groundwater at CAFB and surrounding areas, NMED requests the following information:

1. All PFAS soil, groundwater and surface water sample laboratory analytical data from on- or off-site locations;
2. Any soil and groundwater data accessible to the Air Force pertaining to the off-site presence of PFAS in soil, groundwater and surface water;
3. If such information has already been submitted to the New Mexico Hazardous Waste Bureau ("HWB"), identify the document(s) and date(s) of submittal in lieu of resubmitting the documentation;
4. Geographic Information Systems data layers that include the facility boundary polygon, solid waste management unit and area of concern location polygons, facility structure polygons, well location points within CAFB, any well and monitoring well location points within a three-mile radius of the base, if available;
5. All water supply well aquifer test, and analytical and water quality data for CAFB and any available analytical and water quality data for off-site water supply or monitoring wells collected since 1992;
6. Waste Water Treatment System influent and effluent water quality testing data obtained since 1992;
7. All available water quality testing data obtained from North Playa Lake surface water since 1992;
8. The beginning and end dates of the use of Aqueous Film Forming Foam at CAFB and all available information on the locations it was used;
9. The compositions of the firefighting foams used at CAFB since 1970 and that which is currently in use, if different and the dates of use for each type if more than one type of firefighting foam was used;

10. The location of all waste water/sewage treatment systems and associated waste collection points and discharge points for treated and untreated waste waters.
11. All well logs and well construction diagrams for all existing and previously abandoned monitoring wells, water supply wells and piezometers located at CAFB.

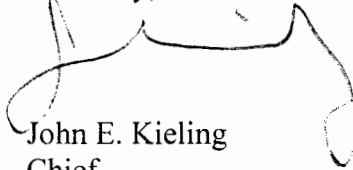
Your compliance with this information request is mandatory. Failure to respond fully and truthfully within the time specified herein, or to adequately justify such failure to respond, may result in an enforcement action by NMED pursuant to section 74-4-10 of the HWA. The HWA provides for the imposition of civil penalties for noncompliance. Section 74-4-12 of the HWA provides that any person who violates any provision of HWA "may be assessed a civil penalty not to exceed ten thousand dollars (\$10,000) for each day during any portion of which a violation occurs." See also sections 74-4-10.A and B of the HWA. The HWA also provides for criminal fines and imprisonment for knowingly omitting material information or making a false statement or representation in any document used for compliance with section 74-4-11.A(3) of the HWA.

The Permittee may claim confidentiality for any information required by this information request pursuant to the requirements of sections 74-4-4.3.D and F of the HWA, and 20.4.1.100 NMAC (incorporating 40 CFR 260.2).

The required information must be provided to the New Mexico Hazardous Waste Bureau no later than **July 8, 2019**.

If you have any questions regarding this letter, please contact Dave Cobrain at (505) 476-6055 or me at (505) 476-6035.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED
B. Wear, NMED HWB
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File: CAFB 2018 and Reading