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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 20, 2019

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

**RE: RESPONSE TO ADDITIONAL INFORMATION REQUEST FOR THE 2019
GROUNDWATER MONITORING PLAN UPDATE
CANNON AIR FORCE BASE, NEW MEXICO
EPA ID #NM7572124454
HWB-CAFB-MISC**

Dear Colonel Hammons:

The New Mexico Environment Department (NMED) is in receipt of the United States Air Force's (Permittee) request for additional information regarding the required update to the Cannon Air Force Base (CAFB) Facility-Wide Long-Term Groundwater Monitoring Plan, dated June 7, 2019. The Permittee's inquiry is addressed as follows:

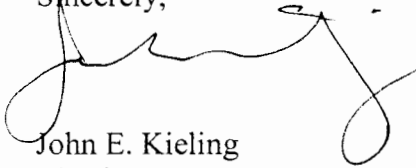
1. As required by NMED's March 19, 2019 *Interim Facility-Wide Groundwater Monitoring Plan* letter requiring an update to the CAFB Facility-Wide Long-Term Groundwater Monitoring Plan (FLGMP), the Permittee must review the revised New Mexico Water Quality Control Commission's New Mexico Water Quality Regulations for Ground and Surface Water Protection at 20.6.2 New Mexico Administrative Code (NMAC) (effective December 21, 2018). Based on the Permittee's knowledge, the information contained in the Facility record, and any other available information source, the Permittee must update CAFB's FLGMP to include identified contaminants of concern (COCs) and appropriate groundwater analytical methods. NMED will formally provide comment, if necessary, following submittal of the FLGMP to NMED for review.

2. COCs addressed in the updated FLGMP are not limited by the constituents listed in 20.6.2.7.T(2) NMAC [formerly 20.6.2.7.WW NMAC], the groundwater quality standards specified in 20.6.2.3103 NMAC, hazardous constituents listed in 40 CFR Part 261 Appendix VIII or the constituents listed in 40 CFR 264 Appendix IX. As required under the authority of the December 2018 CAFB Resource Conservation and Recovery Act Corrective Actions Permit (Permit), the FLGMP must address all COCs that pose or could potentially pose a threat to human health and the environment as evidenced by prior and current operations at CAFB that may have resulted in a release of contaminants to soil, surface water, or groundwater at CAFB. This includes known releases originating from CAFB that may have migrated beyond the Facility boundary (see Permit Section 3.2.2, Contamination Beyond the Facility Boundary).
3. Permit Section 3.3.1, Groundwater Cleanup Levels, outlines the acceptable criteria for selection of appropriate groundwater cleanup standards and screening levels. Based on Permit Section 3.3.1, NMED's tap water screening level for 1,4-dioxane (4.59E+00 micrograms per liter ($\mu\text{g/L}$)) listed in NMED's 2019 Risk Assessment Guidance for Site Investigations and Remediation (RA Guidance), Table A-1: NMED Soil Screening Levels, is currently the applicable groundwater screening level for protection of human health for drinking water in New Mexico. Therefore, analysis of groundwater samples for 1,4-dioxane at select groundwater sampling locations must be incorporated into the updated CAFB FLGMP. Other regulated facilities have used United States Environmental Protection Agency (EPA) Method 8270 Selected Ion Monitoring for 1,4-dioxane. Other methods, such as EPA Method 522 may provide a lower detection limit that meets the current EPA drinking water level. At a minimum, the chosen sample analysis methodology must be capable of detection of 1,4-dioxane at concentrations less than 4.59 $\mu\text{g/L}$ (see Permit Section 4.5, Chemical Analyses).
4. Typically, sulfolane is associated with hydrocarbon refining processes; therefore, the constituent may be eliminated as a contaminant of potential concern (COPC) from the updated CAFB FLGMP, unless the Permittee has determined that sulfolane is a COPC at CAFB. Sulfolane is listed as a 20.6.2.7.T(2) NMAC toxic pollutant and is regulated as a contaminant in groundwater in New Mexico.
5. The NMED will consider extension requests formally submitted in accordance with Permit Section 1.17.2, Extensions of Time.

Col. Hammons
June 20, 2019
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Please contact Gabriel Acevedo of my staff at (505) 476-6043, if you have questions regarding this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kieling". The signature is fluid and cursive, with a large loop at the end.

John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED
B. Wear, NMED
G. Acevedo, NMED
L. King, EPA Region 6 (6LCRRC)
R. Lancaster, CAFB
S. Kottkamp, CAFB
C. Gierke, CAFB
M. Fuchs, CAFB
D. Canales, CAFB

File: CAFB 2019 and Reading