



Certified Mail - Return Receipt Requested

December 14, 2021

Colonel Terence G. Taylor
Commander, 27th Special Operations Wing
100 Air Commando Way, Suite 100
Cannon Air Force Base
New Mexico 88103-5214

**RE: APPROVAL WITH MODIFICATIONS
2020 BIENNIAL GROUNDWATER MONITORING AND ANNUAL
LANDFILL INSPECTION REPORT
CANNON AIR FORCE BASE, NEW MEXICO
EPA ID #NM7572124454
HWB-CAFB-21-001**

Dear Colonel Taylor:

The New Mexico Environment Department (NMED) is in receipt of the Cannon Air Force Base (Permittee) *2020 Biennial Groundwater Monitoring and Annual Landfill Inspection Report* (Report) dated January 28, 2021. NMED has reviewed the Report and hereby issues this Approval with the following modifications.

MODIFICATIONS

1. Section 1.4, Regulatory Framework, Page 1-2

Permittee Statement: "This Report is being completed in accordance with Section 6.4 of the RCRA [Resource Conservation and Recovery Act] permit (Periodic Monitoring Report)."

NMED Comment: Revise the statement to specify Section 6.4 of the December 2018 *Cannon Air Force Base RCRA Permit* (Permit). The Report must be revised accordingly, and a replacement page provided.

2. Section 3.2.5.3, Water Column Thickness Issues, Page 3-4

Permittee Statement: "The depth to groundwater in MW-Ca declined to approximately 340.26 feet BGS [below ground surface] in June 2020. This depth to water resulted in a water column of 9.44 feet in thickness which was below the optimal performance range to be sampled with a bladder pump. As a result of these factors, MW-C was sampled instead of MW-Ca. MW-C will continue to be sampled in place of MW-Ca as it is not expected that the groundwater column length in the [sic] MW-Ca will return to the optimum performance range to be sampled with a bladder pump."

NMED Comment: The Permittee must continue to collect groundwater level gauging data at monitoring well MW-Ca during future scheduled gauging events and the monitoring well must be evaluated in accordance with the NMED-approved June 2014 *Work Plan Addendum for Landfills and Institutional Control Inspection Site*, Section 4.6.1, Well Evaluation. If groundwater level gauging data and well evaluation indicates that the monitoring well has gone dry the well must be abandoned in accordance with State of New Mexico regulations and the Permit and a work plan for the monitoring well abandonment must be submitted to NMED for approval **no later than 90-days** following confirmation of dry well conditions. Revise the Report accordingly and provide a respective replacement page.

3. Section 3.2.6, Investigation Derived Waste, Page 3-5

Permittee Statement: "On 24 September 2020, Cannon AFB discovered that the IDW [investigation derived waste] inside the IDW drum from the June 2020 sampling event was missing; however, the drum and lid were still intact and there was no indication of lid tampering or IDW on the soil. As a result of high heat and low humidity at Cannon AFB [Air Force Base] during the summer of 2020, expansion and contraction of the drum may have loosened the lid seal allowing for evaporation of groundwater."

NMED Comment: The drum containing 40-gallons IDW water generated during the groundwater monitoring event does not appear to have been properly bolted, sealed, and secured or was no longer suitable for the storage of IDW. The Permittee must discontinue use of the unsealed 55-gallon drum used for storage of the IDW water during the 2020 groundwater monitoring event and ensure that a new 55-gallon drum(s) is used during future groundwater monitoring events. The Permittee must also ensure that the drum is appropriately bolted down, sealed, and secured to prevent any loss of IDW. No changes to the Report are required in response to this comment.

4. Section 5.1, Conclusions, Page 5-1

NMED Comment: The following issues were identified in Section 5.1 and must be addressed as follows:

- a. The Permittee stated “[g]roundwater sampling analytical results from June 2020 indicated there are no new contaminant releases to groundwater. Furthermore, there are no identified new or current Base activities that pose a threat to groundwater.” Information provided in the Permittee’s May 2021 *Draft Aqueous Film-Forming Foam [AFFF] Release Areas Phase I Remedial Investigation Work Plan*, Section 2.5.1, Historical and Current AFFF Use, indicates that AFFF containing per- and polyfluorinated alkyl substances (PFAS) compounds are still in use at Cannon Air Force Base (CAFB) at hangers 109, 119, 133, 197, and 204 and in two fire trucks. The continued use of AFFF containing PFAS at CAFB presents the potential for a release of these contaminants to the environment. Revise the Report to address the continued use of AFFF containing PFAS at CAFB. Revise the Report accordingly and provide respective replacement pages.
- b. The Permittee stated that “[b]ased on the results of the SI [2018 *Final Site Inspection Report for Aqueous Film Forming Foam*], additional investigation of PFOS [perfluorooctane sulfonate] and PFOA [perfluorooctanoic acid] groundwater contamination is being planned at Cannon AFB [Air Force Base] as a stand-alone project outside of the Performance Based Remediation contract.” The Air Force contract mechanism is not relevant. PFAS and respective corrective action investigations at CAFB are subject to regulation under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act (HWA); therefore, all PFAS investigation must be conducted in accordance with the requirements specified in the Permit. Investigations conducted in the absence of an NMED-approved work plan may result in the requirement for different and/or additional work beyond that conducted by the Permittee. Applicable technical standards for corrective action investigations at CAFB are described in the Permit, NMED’s 2019 *Risk Assessment Guidance for Site Investigations and Remediation*, and NMED’s 2020 *General Reporting Guidelines for Corrective Action Documents*, as updated. No revisions to the Report are required in response to this comment.

The Permittee must provide replacement pages that address NMED’s required modifications. In addition, a response letter that cross-references where the modifications were addressed must be provided. The response letter must also be provided as an electronic copy. Electronic copies of the redline-strikeout version of the Report showing where all changes were made to the Report and the revised Report must be submitted to NMED no later than **January 24, 2022**.

Col. Taylor
December 14, 2021
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This approval is based on the information presented in the document as it relates to the objectives of the work identified by NMED at the time of review. Approval of this document does not constitute agreement with all information or every statement presented in the document.

If you have any questions regarding this letter, please contact Gabriel Acevedo at (505) 690-5760.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rick Shean', with a stylized flourish at the end.

Rick Shean
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
B. Wear, NMED HWB
G. Acevedo, NMED HWB
L. King, EPA Region 6 (6LCRRC)
L. Dunahee, CAFB
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C. Soto-Lorenzo
J. Burgoon

File: CAFB 2021 and Reading