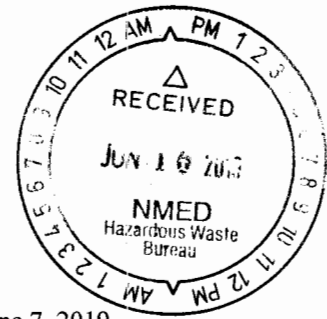




DEPARTMENT OF THE AIR FORCE
AIR FORCE CIVIL ENGINEER CENTER

ENTERED



June 7, 2019

Christipher N. Gierke
Remedial Project Manager
AFCEC/CZO
Cannon AFB, NM

Mr. John E. Kieling
Chief, Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Bldg. 1
Santa FE NM 87505-6313

Dear Mr. Kieling,

This responds to your letters to the Commander of the 27th Special Operations Wing, Colonel Stewart Hammons, regarding the groundwater monitoring field sampling plans for Cannon Air Force Base (CAFB) and Melrose Air Force Range (MAFR). The letters were dated May 7, 2019 for MAFR and May 19 for CAFB.

Consistent with the permits NMED issued to the Air Force for hazardous waste operations at CAFB and MAFR, the Air Force Civil Engineer Center (AFCEC) will prepare updates to its groundwater field sampling plans for CAFB and MAFR. However, the updates will only address properly promulgated revisions to the New Mexico Environment Department's (NMED's) Water Quality Regulations for Ground and Surface Water Protection (published at Title 20, Chapter 6, Part 2 of the New Mexico Administrative Code) that are relevant to operations at CAFB and MAFR. To facilitate AFCEC's revision of the ground water sampling plans, we respectfully request that you please provide answers to the following questions:

1. Regarding 1, 4 Dioxane: This chemical is listed as a RCRA Hazardous Waste (Code U108). USEPA Tap Water Regional Screening Levels are 0.46 ug/L, and GW Health Advisory Level is 0.35 ug/L. However, according to ITRC, this chemical is not detected using standard VOC analytical methods, and is difficult to "detect, monitor, and remediate". Please clarify the appropriate protective concentration level so that sampling results can be compared for compliance demonstration.

2. Regarding Sulfolane (CAS No. 126-33-0): This is an unregulated compound. Please provide a non-arbitrary basis to support the contention that historical and/or current usage of the site would justify sampling Sulfolane. Sulfolane does not have a promulgated Federal standard or numeric standards in NMAC 20.6.2. Further, at present there is no standardized analytical method for Sulfolane analysis. Please provide a rationale for a proposed analytical method and applicable standard for which to demonstrate compliance and completion of corrective action.

I appreciate your time and guidance on these matters. If possible, please provide clarification soonest as the current due dates for the updated field sampling plans are due to NMED on July 1, 2019.

Sincerely

C.N. GIERKE, GS-12, AFCEC
Remedial Project Manager