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**James C. Kenney**  
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Deputy Secretary

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

June 21, 2019

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

**RE: RESPONSE TO ADDITIONAL INFORMATION REQUEST FOR 2019  
GROUNDWATER MONITORING FIELD SAMPLING PLAN UPDATE  
MELROSE AIR FORCE RANGE  
EPA ID# NM5572124456  
HWB-MELR-19-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 dated June 7, 2019 regarding the required update to the Melrose Air Force Range (MAFR) Groundwater Monitoring Field Sampling Plan. The Permittee's inquiry is addressed as follows:

1. As stated in by NMED's May 7, 2019 *Update to Groundwater Monitoring Field Sampling Plan* letter requiring an update to the MAFR Groundwater Monitoring Field Sampling Plan (GWFSF), the Permittee must review the updated New Mexico Water Quality Control Commission's (WQCC) 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 applicable information source, the Permittee must update the MAFR GWFSF to include identified contaminants of concern (COCs) not previously addressed during prior groundwater monitoring at the Facility and appropriate groundwater sample analytical methods. NMED will formally provide

comment, if necessary, following submittal of the GWFSF to NMED for review.

2. COCs addressed in the updated GWFSF are not limited to the constituents listed in 20.6.2.7.T(2) NMAC [formerly 20.6.2.7.WW NMAC], 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 MAFR 1994 Resource Conservation and Recovery Act Permit (Permit), Permit Module IV, HSWA Permit Conditions, Section E, Corrective Action, the GWFSF must address all COCs that pose or could potentially pose a threat to human health and the environment based on prior and current operations at MAFR that may have resulted in a release of the contaminants to soil and/or groundwater at MAFR.
3. The cleanup levels for all contaminants in groundwater shall be the WQCC groundwater quality standards listed in 20.6.2.3103 NMAC, applicable or calculated cleanup levels for toxic pollutants listed in 20.6.2.7.T(2) NMAC, and the drinking water maximum contaminant levels (MCLs) adopted by Environmental Protection Agency (EPA) under the federal Safe Drinking Water Act (42 U.S.C. 300f to 300j-26) or the New Mexico Environmental Improvement Board (EIB), 20.7.10 NMAC. If both a WQCC groundwater quality standard and an MCL have been established for an individual substance, then the lower of the levels shall be the cleanup level for that substance.

The most recent version of the NMED's Tap Water Screening Levels listed in Table A-1 of the 2019 NMED Risk Assessment Guidance for Site Investigation and Remediation (as updated) shall be used to establish the cleanup level if neither a WQCC standard or an MCL has been established for a specific substance. In the absence of an NMED tap water screening level then the EPA Regional Screening Levels for Chemical Contaminants at Superfund Sites (RSLs, as updated) for tap water shall be used. If no WQCC groundwater standard, MCL, NMED tap water screening level or EPA RSL has been established for a contaminant for which toxicological information is published, the Permittee shall use a target excess cancer risk level of  $10^{-5}$  for carcinogenic substances and a hazard index of 1.0 for non-carcinogenic substances as the basis for proposing a groundwater cleanup level for the contaminant. If the background concentration of an inorganic constituent exceeds the standard, then the cleanup level is the background concentration for that specific substance. Any cleanup level based on a risk assessment must be submitted to the NMED for review and approval.

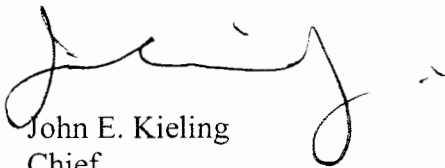
4. Based on the acceptable criteria for selection of appropriate groundwater cleanup standards and screening levels outlined above, NMED's tap water screening level for 1,4-dioxane (4.59E+00 micrograms per liter ( $\mu\text{g/L}$ )) listed in NMED's 2019 Risk Assessment Guidance for Site Investigations and Remediation, 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 GWFSF. Other regulated facilities have used the EPA Method 8270 Selected Ion Monitoring method 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 µg/L.

5. Typically, sulfolane is associated with hydrocarbon refining processes; therefore, the constituent may be eliminated as a contaminant of potential concern (COPC) from the updated MAFR GWFSF, unless the Permittee has determined that sulfolane is a COPC at MAFR. Sulfolane is listed as a 20.6.2.7.T(2) NMAC toxic pollutant, and is regulated by the WQCC as a contaminant in groundwater in New Mexico.
6. An extension of time for submittal of the GWFSF may be requested, with good cause, by sending a written request for extension of time and proposed revised schedule to the NMED. The request must state the length of the requested extension and describe the basis for the request. The NMED will respond in writing to any request for extension following receipt of the request. If the NMED denies the request for extension, it will state the reasons for the denial.

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

Sincerely,



John E. Kieling  
Chief  
Hazardous Waste Bureau

cc: D. Cobrain, NMED  
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