NEW MEXICO
ENVIRONMENT DEPARTMENT

ENTERED

Hazardous Waste Bureau

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 19, 2019

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

RE: INTERIM FACILITY-WIDE GROUNDWATER MONITORING PLAN
CANNON AIR FORCE BASE, NEW MEXICO
EPA ID #NM7572124454
HWB-CAFB-MISC

Dear Colonel Hammons:

The New Mexico Environment Department (NMED) revised its Water Quality Regulations for Ground and Surface Water Protection at 20.6.2 New Mexico Administrative Code (NMAC) effective December 21, 2018. The revised regulations include changes to groundwater quality standards (20.6.2.3103 NMAC) including, but not limited to, Trichloroethylene, 1,1,1,Trichloroethane and 1,1-Dichloroethylene and additions to the toxic pollutant list (20.6.2.7.T(2) NMAC) including, but not limited to, 1,4,Dioxane and Sulfolane.

Section 3.3.1, *Groundwater Cleanup Levels*, of the Cannon Air Force Base Resource Conservation and Recovery Act (RCRA) Permit, issued on December 19, 2018, requires that "cleanup levels for all contaminants in groundwater shall be the New Mexico Water Quality Control Commission (WQCC) groundwater quality standards, 20.6.2.3103 NMAC, the cleanup levels for toxic pollutants calculated in accordance with 20.6.2.7.WW NMAC [modified on December 21, 2018 to 20.6.2.7.T(2) NMAC], and the drinking water maximum contaminant levels (MCLs) adopted by 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 2017

NMED Risk Assessment Guidance for Site Investigation and Remediation ((SSG), 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."

Due to the recent updates to the New Mexico Groundwater Quality Regulations, an update of the CAFB *Facility-Wide Long-Term Groundwater Monitoring Plan* (FLGMP) is required. While recent groundwater monitoring has been conducted on a biennial basis, the Permittee is required to propose a more frequent monitoring schedule in the revised FLGMP for a minimum of the next two years. Because chlorinated volatile organic compounds have historically been detected in groundwater beneath the Facility, the Permittee must propose to include 1,4 Dioxane in the analyte list for all groundwater sample laboratory analysis for a minimum of two sampling events. The analytical method must be capable of detecting 1,4, dioxane at concentrations less than the Cancer Tap Water Screening Level of 4.59 micrograms per liter (µg/l) as listed in the NMED 2017 and 2019 *Risk Assessment Guidance for Site Investigations and Remediation* (e.g., EPA Method 8270C). The revised 2019 FLGMP must be submitted to the NMED no later than **July 1, 2019**.

The Cannon Air Force Base (Permittee) FLGMP must be updated annually to include changes in monitoring or monitoring of additional wells, if installed. If no updates are made for a specific calendar year, the Permittee must submit a letter stating that no updates were made to the FLGMP for that specific calendar year for NMED approval. Beginning in 2020, the annual update to the FLGMP or the letter stating that no changes were made to the plan must be submitted no later than **April 1 each year**.

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

Sincerely,

John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED
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