



# 27th Special Operations Wing

## Public Affairs



## PFAS Update

12 November 2024

### Q&A Summary

*Current as of 3 January 2025*

**Q: If someone wants to establish a new drinking water well in the zone of interest - say they want to build a house - but they have PFAS in their water supply, how do they get their drinking water cleaned by the Air Force?**

**A:** The property owner must first install the well and occupy the residence, then the property owners would need to talk to the installation Remedial Project Manager (RPM), Mr. Gierke, about getting their drinking water well sampled. If sampling reveals PFAS concentrations that exceed the PFAS maximum contaminant levels (MCLs), DAF will take a response based on DoD policy for private drinking water. If the well is never drilled, or the residence is never occupied, there is no completed pathway to exposure and as such no unacceptable risk that must be addressed immediately. In that scenario, the response would come later in the cleanup process, once the remedial investigation is complete and a final remedy is selected for the PFAS migrating from Cannon AFB.

**Q: We submitted a FOIA request four years ago and have finally determined that there are some 80-90,000 gallons per minute flowing under the Air Base and subject to contamination from the 18 million gallons of PFAS in the water column. Given that the pilot project is designed to treat 1,600 gpm, why don't you just treat the contaminated water that neighboring land-owners are extracting in order to go from 2% to 100% of water consumed?**

**A:** The pilot studies are specifically targeted to cut off any further migration off the Base. Installation of the monitoring wells off base will advance the Remedial Investigation and determine nature and extent. That information will inform what the most effective clean up method we can employ off base. Without having the full nature and extent, determining a cleanup method would be ineffective.

**Q: Have you acquired rights to inject water into the earth? What state agency is responsible for overseeing that project?**

**A:** We will be following the substantive requirements from NMED's injection requirements.

**Q: What percent of contamination on base are you expecting to capture?**

**A:** From the information we currently have, it looks like the aquifer may get close to full capture and removal. However, we won't know until we get into the operational phase of the pilot studies. Apart from capturing contamination, the pilot study will put PFAS-free water back into the ground.

**Q: It's been said that the "pilot project" main objective is to remove contaminants and halt further contamination of ground water that is being consumed. It's been said that this study has been chosen to remedy the depleting water source. Will Cannon AFB provide a CCR stating the water quality data for the residents that consume this ground water and is being taken from their consumption source, treated, then pumped back into the aquifer?**



# PFAS Update

A: Consumer Confidence Reports are not prepared by the Air Force as part of remediation efforts for the Pilot Study. They are prepared by public water system operators under different legal drivers than environmental restoration. There will be sampling through the treatment process, and that validated data will become available to all on the Administrative Record, as well as being sent to NMED.

**Q: What is the concentration of PFAS in CAFB's drinking water?**

A: We publish drinking water quality reports on our website. The most recent water quality report is located here: [Microsoft PowerPoint - 2023 CCR V5](#)

**Q: Your references to the pilot project showed historic dates. When will this pilot project be finished so you can determine how to treat people's drinking water or agricultural water that contributes to contamination in the food chain?**

A: The pilot study is for the pumping and treating of the water coming off base. The pilot studies will provide information needed to evaluate both interim actions the Air Force can take now and the long-term remedy. It will run for about a year as the pilot study. Then when the EE/CA is completed, and if the outcome shows that a pump and treat system is the best option for treating the aquifer, the system will continue to run and may be expanded as needed.

**Q: Is being listed as a Sentinel Landscape tied to the fact that there has been groundwater contamination? Camp Lejune is also listed as one of the Sentinel Landscapes.**

A: No, Sentinel Landscape designation is based on water conservation efforts. Not in any way associated with any kind of ground water contamination.

**Q: Has CAFB provided and maintained PFAS filtration systems for private well owners around the base?**

A: For the locations that we had detections above the screening level, we offered filtration and are maintaining it at those locations that accepted the offer.

**Q: How will CAFB be implementing the new PFAS MCLs? Will AFCEC be re-opening sites it closed out (and excluded from the RI) using a 70 ppt screening level?**

A: The DoD is currently relooking at all the data that has been collected thus far and determining where additional sampling is required. The AF is working on an AF wide contract to go out and do additional drinking water samples to make sure that criteria is met.

**Q: When will off-base remediation begin?**

A: That is again dependent on the remedial investigation and the off-base monitoring wells. Once that information is gathered and we can start looking at an interim action to affect cleanup off-base.

**Q: Where is removed PFAS being disposed of? Is removed PFAS being sent to a RCRA landfill?**

A: PFAS is being disposed of in accordance with DoD guidance and it depends on the concentrations which landfill it will be sent to. One of the options is a RCRA C and there is some guidance on a RCRA-D depending on the concentration and how that landfill is constructed.



# PFAS Update

**Q: What specific PFAS will Cannon be testing for and using what methodology in terms of its most recent improper release?**

A: EPA method 1633 and they will be looking at PFAS and PFOA and the constituents coming back from that.

**Q: Is AFCEC looking at natural resource damages at and around CAFB?**

A: AFCEC is focused on investigating and mitigating the PFAS impacts to human health and the environment on and off-base.

**Q: Why is CAFB sending PFAS wastes to a Texas hazardous waste landfill if it is not hazardous?**

A: If you're asking why we don't utilize New Mexico landfills, it's because they will not accept it based on NMED guidance

**Q: Which screening levels? Past EPA advisory or current MCLS?**

A: The DoD is currently looking at all the MCLs put out by EPA and looking at current data to see if we need to retest or conduct additional testing.

**Q: The Air Force recently challenged the EPA's authority to enact limits on PFAS. That issue was initiated by Air Force officials overseeing the Tucson, AZ facilities of the Air Force. Does the command at Cannon Air Force Base maintain that the EPA lacked authority to establish the standards of 4 parts per trillion? Are you planning on challenging those limits since the pilot project was designed around the 70 ppt standard?**

A: The command team will follow DoD guidance on that and current AF guidance is what we will abide by.

**Q: To follow up with a CCR not being part of the action plan, if no report is going to be provided to the consumers of this pilot project, how will consumers know that byproducts or other elements haven't had negative effects on their water source during treatment procedures? Without a report there is no trust in the process.**

A: Consumer Confidence Reports are not prepared by the Air Force as part of remediation efforts. They are prepared by public water system operators under different legal drivers than environmental restoration. There will be sampling through the treatment process, and that validated data will become available to all on the Administrative Record, as well as being sent to NMED. The AF will be following EPA regulations and following the substantive requirements of NMED permit program for reinjection.

**Q: How will the results of community blood testing and drinking water testing potentially impact your response to off-base cleanup?**

A: It will be very interesting to see what those results will show. As we know PFAS is prolific through all different types of products, cleaning, plastic, medical, agricultural, pesticides, herbicides, insecticides, there is the AFFF and multiple different industries in home and commercial use that utilize these products.

**Q: Will the pilot studies treat all PFAS? To what concentration?**

A: It does treat all the PFAS we are sampling for under the 1633 and its levels do show it does treat it down until it is at no detect based on our treatability studies we've done thus far. Once it gets operational and we can verify all those numbers with DoD standards and adjust those systems as necessary.



# PFAS Update

**Q: Clarifying; you said you were providing water filters for offsite locations where PFAS exceeded screening levels. Which screening levels did you mean?**

A: The initial 70ppt.

**Q: Is data generated in the RI being shared with NMED as it comes in (vs. in a final report that is publicly available in the AR)?**A: Yes, validated data has been shared with NMED and Secretary Kenney.

**Q: Why are you not putting filters off base to homes and water users that are affected?**

A: Thus far with the sampling we have, we only have the three locations above that level but DoD is currently looking at the implementation through the new MCLs and currently looking at a contract executed within the next few months and that contract is AF wide. We will be looking at doing additional sampling of drinking water wells at the off base to ensure that there are no impacts to human drinking water.

**Q: Has PA considered in-person meetings? More frequently? You could still offer a zoom option for people unable to attend in person.**

A: Yes, we are considering more options for more frequent and in-person meetings based on the attendance today and the interest in this issue.

**Q: How do you plan to compensate landowners for 1) polluting their groundwater 2) access to land for monitoring wells and 3) for extended pump and treat facilities?**

A: The Air Force restoration authorizations and efforts focus on investigating and mitigating the impact of PFAS releases associated with the use of PFAS-containing fire-fighting foam at Cannon AFB in the past. The laws governing the investigation and cleanup process do not include paying compensation for groundwater contamination. The Air Force will work terms of access with individual landowners as needed to complete Air Force restoration activities.

**Q: What type of filtration system is being used? Is it GAC, Ion exchange resins, reverse osmosis, etc.?**

A: It's a combination of Ion exchange with GAC pretreatment.

**Q: Will DoD use its eminent domain authority to monitor and remediate off base if the dairy farmers do not agree to allow access?**

A: The Air Force will not try to take anyone's property. The Air Force will request access from landowners and if terms of access cannot be worked out, the Air Force will either change course and not attempt to do restoration activities on a non-consenting landowners' property or the Air Force will request US Department of Justice assistance in obtaining a court order that requires the landowner to provide access. The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA, 42 U.S.C. §§ 9601-9675) is the federal law the Air Force is governed by in addressing PFAS impacts at Cannon. Section 104(e) of CERCLA (42 U.S.C. § 9604(e)) requires landowners to provide access to a federal agency performing restoration work in accordance with that statute.

**Q: Don't those two particular filtration system have the ability to further pollute the water?**

A: Part of the process we do is take samples to ensure there is no breakthrough and ensure that the water meets those standard requirements before reinjecting the water.

**Q: Can the Colonel go into more detail about the new training procedures to prevent more accidental releases?**



## PFAS Update

A: Any future disposal, release, discharge of anything that might be considered to contain PFAS; that approval is held at the installation commander level. Additionally, the oversight of any equipment associated with that has also been pulled up to the commander's level for monitoring. Additional training, monitoring, and oversight is being conducted at the conclusion of that commander directed investigation, so we know where specific areas need improvements. **Q: Have other lined pits on the base been checked for tears?**

A: The only "pit" is the fire training pit and it's the only one that has ever been used for discharge, no additional pits are on the installation.

**Q: Has Cannon been able to obtain fluorine free foams?**

A: Yes, we have. All our firefighting vehicles have transitioned to the new foams.

**Q: The new foam is being used for both training and actual fires?**

A: That is accurate. We haven't responded to a fire yet, but yes, we are equipped to use the new foams for fires and training as needed.

**Q: Mr. Gierke said that the pumping and cleaning would start in January when his long-awaited equipment arrives. He also said that they won't start until the monitoring field is finished. Which is it and why?**

A: For clarification, the equipment will hopefully arrive in January, and we'll be able to test all these systems and then the system will go fully operational in March. That will start the pumping and treating process for the pilot study at the Southeast corner. That is not contingent on monitoring the wells off-base. Continuing our remedial investigation off-base and determining the nature extent of impacts on the ground water does depend on that. And being able to take and determine any interim or long-term actions does also depend on that to delineate any off-base impact with those monitoring wells.