



New Mexico Environment Department
Ground Water Quality Bureau

**Document Review
Comments**

Document Title:	Site Inspection, Uniform Federal Policy Quality Assurance Project Plan (UFP-QAPP) Addendum, Santa Fe Army Aviation Support Facility, Rio Rancho, New Mexico
Document Date:	July 2021
Document Author:	Army National Guard
Reviewed by:	Paul Chamberlain, Justin Ball
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Item	Page(s)	Section	Line	Comment
1	23	Worksheet 10	581	What does the regular service of Tri-Max 70/30 hand trucks entail, and is there a possibility of discharge during service?
2	24	Worksheet 10	640	What does the regular service of Tri-Max 70/30 hand trucks entail, and is there a possibility of discharge during service?
3	35	Worksheet 11	729	Pursuant to 20.6.2.3103 NMAC, PFHxS is a regulated toxic pollutant in New Mexico and should be included as a constituent to be evaluated at the Santa Fe AASF.
4	51	Worksheets 14 and 16	N/A	NMED requests that the schedule be updated to reflect the current estimated timeline; NMED requests advance notice before performing any field activities.
5	53	Worksheet 15-1	N/A	NMARNG should apply the NMED screening level of 70 ng/L for individual concentrations of PFHxS in groundwater.
6	53	Worksheet 15-1	N/A	According to NMED's <i>Risk Assessment Guidance for Site Investigations and Remediation, Volume I, February 2019 (Revision 2, 6/19/19)</i> , "... when PFHxS and other longer-chain PFAS are detected in drinking water, the sum of the concentrations of all longer-chain PFAS should be compared to 0.07 µg/L" (pg. 93). The summation of PFOS, PFOA, and PFHxS concentrations should be compared to a total screening level of 70 ng/L.
7	53	Worksheet 15-1/15-2	N/A	NMED requests that the ARNG provide the results of the entire PFAS analytical suite.
8	53-56	Worksheet 15-1/15-2	N/A	NMED notes that LOD, LOQ, and DL for both laboratories are different. However both laboratories achieve appropriate data quality objectives by following the DOD/DOE QSM for Environmental Laboratories Version 5.3 (2019).
9	55-56	Worksheet 15-2	N/A	NMED contends that PFHxS concentrations in soils should be compared to the same screening level as PFOS

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				and PFOA; 130 µg/kg for 0-2 ft. bgs and 1,600 µg/kg for depths greater than 2 ft. bgs.
10	55-60	Worksheet 15-2 and SLs for Soil and Groundwater	N/A, 908-919	NMED guidance does not stratify screening levels based on depth, however the rationale behind this approach is understood and NMED agrees with the proposed screening levels.
11	62	Worksheet 17	Table 17-1	As discussed and agreed upon by NMED and NMARNG during the October 1, 2021 TPP meeting 1&2, collect shallow soil samples (0-2ft bgs) from two additional hand auger borings to better characterize the area of the former fire truck bay.
12	62	Worksheet 17	985-986	Alternatively, initial decontamination of equipment using steam cleaning followed by a final rinse with PFAS-free water is acceptable to NMED to reduce the volume of investigation derived waste.
13	71	Figure 17-1	N/A	As discussed and agreed upon by NMED and NMARNG during the October 1, 2021 TPP meeting 1&2, relocate boring AOI01-02 approximately 120 ft. to the west, within the landscaped area, to minimize disturbances to hard surfacing and reduce the possibility of hindering access and any pedestrian or vehicular traffic.
14	73-75	Worksheet 18	N/A	See comments 7 and 9
15	N/A	Standard Operating Procedure for Disposal of Investigation-Derived Material	N/A	NMED recognizes and accepts the addition of EA Engineering, Science, and Technology, Inc., PBC's <i>SOP No. 042A for Treating Liquid Investigation-Derived Material (Purge water, drilling water, and decontamination fluids) (Revision 1, March 2021)</i> .