

Comment Matrix for the Draft Final PFAS SI - Santa Fe, New Mexico							
Response Code: A = Agree with comment D = Disagree with comment C = Comment requires clarification							
Comment Number	Commenter	Page(s)	Section	Line(s)	Comment	Response Code	Response
TECHNICAL COMMENTS							
1	PRC	2-2	2.2.2	441	The community of La Cienega is located adjacent to, and downgradient of the AASF, and relies exclusively on groundwater from the MDWCA and private wells for drinking water and other daily uses.	A	The following statement was added to the third paragraph of section 2.2.2: "Additionally, the community of La Cienega is located adjacent to, and presumed to be downgradient of the Facility. La Cienega residents rely exclusively on groundwater for drinking water, provided by individual residential wells and two public water systems, one of which derives its drinking water from a well approximately 1.8 miles potentially downgradient from the Facility."
2	PRC	3-2	3.2.1	622	NMED requests further evaluation and discussion of the two documented aircraft crashes at the Santa Fe Regional Airport due to the described location of the Mooney M20 incident and the uncertainty surrounding the crash rescue fire truck and the use of AFFF.	A	No further public documentation was found during the PA and SI. ARNG will defer to Airport officials to divulge details of crashes associated with the airport, including the potential use of AFFF in the emergency responses. The Mooney M200 incident occurred adjacent to Hwy 25, almost a mile from the airport, according to online media sources. Text will be retained as written.
3	ACY	3-2	3.2.2	625-634	Pursuant to 40 CFR Part 503, the City of Santa Fe disposes of their biosolids at a surface disposal site not a land application area. NMED requests the facility be correctly referred to throughout the document.	A	Throughout the document, 'land application area' was replaced with 'surface disposal site'.
4	ACY	3-2	3.2.2	627-629	NMED requests further evaluation of the solar panels since scientific literature indicates PFAS could potentially be used in PV solar panels, but it is not typically used. Therefore, further evaluation is needed prior to the solar panel farm being listed as a potential alternative source.	A	Section 3.2.2 was reorganized to keep the biosolids information together. In addition, the statement regarding solar panels was revised as follows, "A solar panel farm exists within the Santa Fe WWTP surface disposal site. Although research is conflicted about the potential of PFAS in the construction of solar panels, the solar farm is considered a potential PFAS source due to incomplete data regarding solar panel construction and the possible use of PFAS-containing insulated electrical wires and cables within the solar farm."
5	PRC	6-3	6.3.1	1086	All surface soil SL exceedances at AOI1 occurred within 125 feet of the former fire truck bay, thereby indicating that the primary release or releases of PFAS occurred on the AASF property.	D	Although ARNG G-9 acknowledges evidence of PFAS release attributable to NMARNG activities, SI results also identify surface soil PFAS exceedances at the facility boundary not attributable to MNARNG activities. As such, ARNG cannot concur that soil exceedances at AOI 1 are the primary release mechanism on the AASF property. Full characterization of the contamination will occur during the RI.
6	PRC	6-3	6.3.3	1133-1134	All groundwater SL exceedances at AOI1 occurred downgradient of AASF property, thereby indicating that historical AASF activities are the primary contributor to PFAS groundwater contamination. Therefore, considering Comment Number 1, further evaluation of AOI1 should include an assessment of off-site migration.	D	Full characterization of the contamination will occur during the RI, including plume nature and extent. ARNG does not concur that activities at the AASF are the primary contributor to PFAS groundwater contamination, as other offsite contributors have not been fully assessed, and hydraulic connectivity is not yet fully understood at the site.
7	PRC	6-5	6.5.3	1227-1228	NMED requests further evaluation and discussion of the two documented aircraft crashes at the Santa Fe Regional Airport due to the described location of the Mooney M20 incident and the uncertainty surrounding the crash rescue fire truck and the use of AFFF.	A	The following information was added to Section 3.1. "Historically, certain training and foam testing were required by the Federal Aviation Administration (FAA), and are assumed to have occurred at the Santa Fe Regional Airport. Since 2018, FAA has worked on reducing releases of AFFF on airports under their jurisdiction, and has adopted the use of testing procedures that do not require dispensing foam." In addition, NMED should refer to the response to Comment No. 2.
8	PRC	8-1	8.2	1427	Considering Comment Number 1, NMED requests the RI for AOI1 include an assessment of off-site migration.	A	The nature and extent of the PFAS contamination will be determined during the RI in accordance with CERCLA and DoD guidance, including groundwater used for drinking water.