



New Mexico Health and Environment Department

February 5, 1990

Mr. Bobby Williams, 6H-CX
U.S. EPA - Region VI
1445 Ross Avenue
Dallas, Texas 75202-0968

GARREY CARRUTHERS
Governor

DENNIS BOYD
Secretary

MICHAEL J. BURKHART
Deputy Secretary

RICHARD MITZELFELT
Director

**RE: Holloman Air Force Base (HAFB)
Comprehensive Ground Water Monitoring Evaluation
NM6572124422**

Dear Mr. Williams:

The New Mexico Environmental Improvement Division (EID) has reviewed the Environmental Protection Agency's (EPA) August 15-17, 1989 Comprehensive Ground Water Monitoring Evaluation (CME), dated January 17, 1990, and is substantially in agreement with EPA's conclusions. EID does disagree with the characterization of MW-1 and S-2 as "background wells unaffected by the facility" (CME Section 3, page 1, item IIA). Until the first year background sampling is complete, EID will not consider that these wells are background wells for the purposes of interim status detection monitoring. Upon closure, all wells in the monitoring system will be screened for Section 264, Appendix IX constituents. EID will withhold judgement on the appropriateness of S-2 and MW-1 as background wells for the purposes of closure until such evaluations demonstrate that these wells are free of Appendix IX constituents.

We have information to the effect that there are or were abandoned USGS monitoring wells at HAFB which had apparently been used for the disposal of solid wastes, possibly animal carcasses. It is unclear whether these wells have been plugged (CME Section 4, Page 1, item IB). EID will address this question to HAFB.

It has been our understanding that each CME groundwater analysis must include a complete Appendix IX scan or a subset thereof. EPA did not do this at HAFB. Has this policy been changed at Region VI?

If you have any questions regarding this matter, please contact Dr. Bruce Swanton of my staff at (505) 827-2925.

Sincerely,

Julie Wanslow, Supervisor
Hydrogeology Section
Hazardous Waste Program

JW/bas

cc: Sharon Moore, HAFB
Tracy Hughes, NMEID Counsel