



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

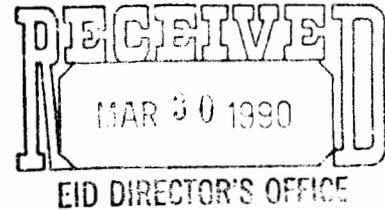
REGION 6

1445 ROSS AVENUE, SUITE 1200

DALLAS, TEXAS 75202-2733

*Please handle*

*RM*  
*E. Kirk J.*  
*J. T. H.*



March 28, 1990

Mr. Richard Mitzelfelt  
Director  
Environmental Improvement Division  
New Mexico Health and Environment Department  
P.O. Box 968  
Santa Fe, New Mexico 87504-0968

Dear Mr. Mitzelfelt:

In late January your staff requested approval of a closure scheme for Holloman Air Force Base (HAFB). Two courses acceptable to the State were suggested:

1. Allow a modified closure, call for a post-closure care plan and permit; or
2. Accept a delay of closure pursuant to the final rule published in the Federal Register on August 14, 1989.

The second option is not available to HAFB because it applies to facilities that have interim status and that are seeking a permit for the unit. HAFB lost interim status for the sewage lagoons in 1985 for their inability to certify the existence of an adequate ground water monitoring system. Also, HAFB is not seeking a permit for these units.

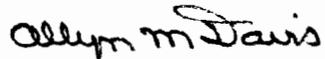
The first option is also not a viable alternative. The regulations allow for only two types of closure; (1) closure in place, and (2) clean closure. Closure in place requires the owner/operator to eliminate free liquids by removing liquid waste or solidifying the remaining wastes and to cover/cap the surface impoundment. These requirements are inconsistent with the continued use of the surface impoundments as sewage lagoons.

Clean closure would require the removal or decontamination of all waste residues and contaminated subsoils. Once clean closure was accomplished, HAFB could use the units as sewage lagoons. Clean closure has not been proposed as a closure method. Holloman's proposal for closure does not fit either of the two closure categories listed above.

While we realize that denying the use of the proposed closure scheme creates significant problems for the facility, the regulations do not allow acceptance of the proposal. It is important that we apply the regulations equitably. HAFB has previously been given all the latitude the regulations allow. To allow them to pursue a closure plan which does not comply with the minimum requirements of the regulations is unacceptable.

If you have any questions, please call me, or have your staff contact Court Fesmire at (214) 655-2192.

Sincerely yours,

A handwritten signature in cursive script that reads "Allyn M. Davis".

Allyn M. Davis  
Director  
Hazardous Waste Management Division (6H)

cc: Mr. Boyd Hamilton, Program Manager  
The Health and Environment Department  
New Mexico Environmental Improvement Division