



DEPARTMENT OF THE AIR FORCE

HEADQUARTERS 833D COMBAT SUPPORT GROUP (TAC)

HOLLOMAN AIR FORCE BASE, NM 88330-5000



18 JUL 1990

REPLY TO
ATTN OF 833 CSG/DEV

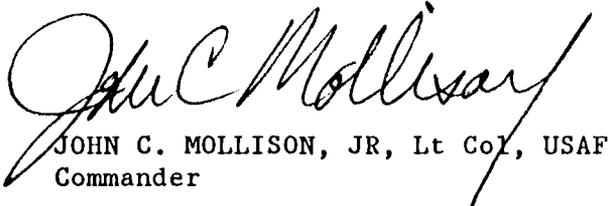
SUBJECT Closure Plan

TO
Mr. Allyn M. Davis
US Environmental Protection Agency, Region VI, 6H-CS
First Interstate Bank Tower
1445 Ross Avenue
Dallas, TX 75202-2733

1. On 19 June 1990, I received your letter requesting Holloman Air Force Base (HAFB) submit a closure plan for the sewage treatment lagoons that accords with Title 40, Part 265 Subparts G and K, Code of Federal Regulations. Today we are submitting to you, under separate cover, our closure plan which incorporates the New Mexico Environmental Improvement Division's (NMEID) comments provided to us in a meeting in Santa Fe on 13-14 November 1989. This closure plan provides for the continued use of the sewage treatment lagoons and outlines the corrective actions undertaken by HAFB to remove PCB contaminated sludges from the affected areas of Holloman's sewage treatment lagoons. Currently our contractor is in the completion stages of a risk assessment which will quantify the impact, if any, to health and the environment, given the continued use of the lagoons for non-hazardous wastewater treatment.

2. On 13 July 1989, the NMEID submitted to HAFB a Notice of Disapproval (NOD) of our Sewage Lagoon Closure Plan. Following our request for your formal comments on our closure plan, Mr. Courtland Fesmire of your staff informed my Environmental Coordinator and the HQ TAC Judge Advocate Director of Environmental Law that the NMEID would be acting as lead regulatory agency for the processing of the Holloman Sewage Lagoon Closure Plan. Because the NMEID had the lead, we met with them to discuss their concerns and comments. We agreed there were two acceptable courses of action for resolution of the problems at HAFB, either of which is protective of human health and the environment and would allow for the continued use of the lagoons. These options are as follows: 1) allow a modified closure and submit a post-closure care plan and permit, or 2) allow HAFB to file a delay of closure pursuant to the August 14, 1989, final rule.

3. If you disagree with our approach to closure, we request that you respond in writing and identify those portions of our submitted closure plan which you find deficient. Upon receiving your response, we would then propose a meeting to discuss our differences such that we make every reasonable effort to informally resolve any dispute at the project manager or immediate supervisor level.


JOHN C. MOLLISON, JR, Lt Col, USAF
Commander

cc: See Attached Distribution List

Readiness is our Profession

DISTRIBUTION LIST

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