



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 833D COMBAT SUPPORT GROUP (TAC)
HOLLOMAN AIR FORCE BASE, NM 88330-5000

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13 JAN 1991

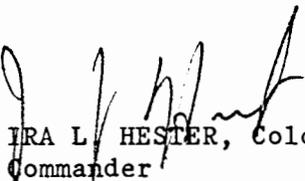
REPLY TO
ATTN OF: DE

SUBJECT: Closure Plan -- Sewage Treatment Lagoons, Holloman AFB, NM

TO: Mr Allyn M. Davis
Director
Hazardous Waste Management Division (6H)
USEPA Region VI
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733



1. Thank you for meeting with us on 4 Jan 1991. We have prepared a Memorandum of Record (attached) based on this meeting. We are requesting you sign and return it to us if you concur with the memo as prepared. If you do not concur, please give us your comments and we will revise it to a mutually-acceptable record.
2. As we agreed in our meeting, Holloman AFB will not be submitting our revised closure plan, referenced in your letter of 11 Dec 1990, by 16 January 1991. Instead, as you requested, we are working with the NMEID to establish a meeting date and location that is mutually acceptable to the NMEID, USEPA Region VI, Holloman AFB, and HQ TAC. At this meeting, we plan to discuss the closure plan and the methodology by which a clean closure would be achieved based on a site specific risk assessment (referenced in the 19 March 1987 Federal Register). Our closure plan will be revised based on the outcome of this meeting.
3. It appears the NMEID may not be able to meet during the week of 14-18 January. We now propose a meeting on 31 Jan or 1 Feb 1991, in Santa Fe, New Mexico. We look forward to meeting with you as soon as the meeting can be coordinated.


IRA L. HESTER, Colonel, USAF
Commander

Atch
Memorandum of Record

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MEMORANDUM FOR RECORD

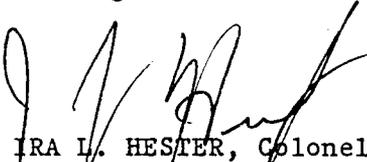
1. REGARDING: Meeting on 4 Jan 1991
2. SUBJECT: Holloman Sewage Treatment Lagoons
3. LOCATION: EPA Region VI; Dallas, Texas
4. PERSONNEL CONTACTED: (see attached listing)
5. IMPORTANT POINTS:

a. Col Ira Hester, Commander, 833d Combat Support Group, Holloman AFB, NM, informed Mr Allyn Davis, USEPA Region VI, that Holloman AFB proposes to comply with the Federal Facility Compliance Agreement, signed on 20 December 1988, by pursuing a clean closure supported by a site-specific demonstration (i.e., risk assessment). Site specific demonstration of clean closure is discussed in the preamble to the final rule for Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities, 40 CFR Part 265, published 52 Federal Register 8704, 8706, 19 Mar 1987.

b. Mr Davis' answer to Col Hester was that EPA Region VI could not approve a site specific risk assessment to support a clean closure; however, the state of New Mexico having authority for RCRA closure in the matter of Holloman AFB, could approve a clean closure supported by a site specific risk assessment. Mr Davis added that Holloman would have to meet with the state and convince them to set a precedent in this matter and, if the state agrees to proceed with this option, EPA Region VI would be performing the technical review of Holloman's closure plan and risk assessment.

c. Col Hester requested that, in lieu of submitting an incomplete closure plan to EPA Region VI to comply with their 11 December 1990 letter, we meet with the state regulators and representatives from EPA Region VI in Santa Fe, NM in two weeks to discuss Holloman's proposal of a clean closure supported by site specific risk assessment. Mr Davis agreed.

We, the undersigned, agree that the events described in this Memorandum for Record are factual and reflect the current position of the parties at the meeting.


IRA L. HESTER, Colonel, USAF
Commander, 833d Combat Support Group
Holloman AFB, New Mexico

ALLYN M. DAVIS, US EPA Region VI
Director, Hazardous Waste Manage-
ment Division

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