



DEPARTMENT OF THE AIR FORCE

HEADQUARTERS 833D COMBAT SUPPORT GROUP (TAC)

HOLLOMAN AIR FORCE BASE, NM 88330-5000

REPLY TO  
ATTN OF DEV

SUBJECT Compliance Agreement Quarterly Report



TO Mr Courtland Fesmire  
Environmental Engineer  
US EPA, Region VI, (6H-CS)  
First Interstate Bank Tower  
1445 Ross Avenue  
Dallas, TX 75202-2733

1. Pursuant to the requirements set forth in Section X--REPORTING AND EXTENSIONS section of the Compliance Agreement signed on 20 December 1988, we hereby submit the ninth quarterly progress report (see Atch 1). This report will provide a brief outline of events from 1 Jan to 31 Mar 1991.
2. Two meetings were held this quarter regarding closure of the lagoons; a copy of the minutes from each meeting is provided at Atchs 2 and 3.
3. Documentation for the contents of the attached report is available upon request from the 833 CSG/DEV office at Holloman AFB. If you have any questions or comments, please contact Sharon N. Moore, (505) 479-3931.

  
HOWARD E. MOFFITT  
Deputy Base Civil Engineer

- 3 Atchs
1. Compliance Agreement Report (2 cys)
  2. January 4, 1991, meeting minutes
  3. January 31, 1991, meeting minutes

cc: w/Atchs  
HQ TAC/DEV  
833 CSG/CC  
833 AD/JA  
US EPA (Mark Peycke)  
NMEID (Dr Bruce Swanton)  
US Army COE, Omaha, NE (B. Stewart)  
BLM (Jim Fox)  
DOI (Raymond P. Churan)  
F & W Service (Tom O'Brien)

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COMPLIANCE AGREEMENT QUARTERLY REPORT

HOLLOMAN AIR FORCE BASE

GROUNDWATER MONITORING PLAN  
AND  
HYDROLOGICAL INVESTIGATION REPORT

NINTH QUARTERLY PROGRESS REPORT

1 JAN 1991 - 31 MAR 1991

PREPARED BY

HOLLOMAN AFB, NM  
833 CSG/DEV

3 April 1991

QUARTERLY PROGRESS REPORT  
1 Jan--31 Mar 1991

On 4 Jan 1991, a meeting was held at EPA Region VI, Dallas, TX to discuss the closure of the Holloman Sewage Treatment Lagoons. A copy of the minutes from this meeting is provided at Atch 2.

On 09 Jan 1991, HQ TAC requested HQ USAF/LEEV-CR (Mr Ed Lopez) assist with arranging a meeting in Santa Fe, New Mexico between the Air Force (Holloman AFB and HQ TAC) and the NMEID.

On 18 January 1991, Mr Ed Lopez and Mr Ronald Jahns, Department of the Air Force Regional Environmental Office, met with Dr Bruce Swanton to discuss Mr Davis' requirement for the Air Force to meet with the state and find out if they would allow for a clean closure based on a site specific risk assessment.

On 25 January 1991, Holloman AFB received a letter from the NMEID requesting all correspondence related to the FFGA be changed from Boyd Hamilton to Dr Bruce Swanton.

On 29 January 1991, Holloman received the Draft Quality Control Summary Report for Surface Water Sampling at Holloman Air Force Base.

On 31 January 1991, Holloman received comments from the United States Fish and Wildlife Service on the Draft Risk Assessment for the Sewage Treatment Lagoons.

On 31 January 1991, a meeting was held in Santa Fe, New Mexico to discuss clean closure based on a site specific risk assessment as described in the preamble of the Mar 19, 1987 FR. A copy of the minutes from this meeting is provided at Atch 3.

On 14 February 1991, Holloman AFB was informed by HQ TAC that we may have the opportunity to put a sewage treatment plant in the FY 93 Military Construction Program. Through the Mobile (Alabama) District Army Corps of Engineers CH2M Hill was contracted to prepare Project Definitions (PD). The PD process is to develop the scope, technical approach, and cost for upgrading the Holloman AFB wastewater treatment system. Representatives from CH2M Hill visited Holloman AFB from 19-22 February to conduct a records/document review, visit the wastewater generation activities, tour the wastewater treatment facility, talk with Holloman AFB staff and collect site maps, utility and sewer maps, identify base design standards, etc. On 29 Mar 1991, the preliminary Project Definition was completed and provided to Holloman AFB.

On 28 Feb 1991, HQ TAC provided the USEPA and the NMEID an outline of Holloman's proposed sampling and analysis plan.



DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS TACTICAL AIR COMMAND  
LANGLEY AIR FORCE BASE VA 23665

19 March 1991

Mr Mark Potts  
Chief ALONM Section  
U.S. Environmental Protection Agency, Region VI  
1445 Ross Avenue  
Dallas, Texas 75202-2733

Dear Mr Potts

We are providing an attached copy of the minutes from our 31 January 1991 meeting in Santa Fe, NM. We consider this action to be in fulfillment of the Air Force commitment to prepare the meeting minutes. We request that you sign and return a copy to us. If you wish to make editorial comments please respond by Telefax or voice to Mr Brent Johnson, HQ TAC/DEVC, FAX (804) 764-5363, Voice (804) 764-4430. We have also sent a copy of the minutes to NMEID for their concurrence.

Per our 14 March telephone conference call, we look forward to receiving your response on the following issues: (1) our Draft Sampling and Analysis Plan Outline, submitted 28 February 1991, [ref: para 5e., Attachment]; (2) EPA data for determining statistical increase in Total Organic Carbon in Holloman AFB groundwater, [ref: para 5c., Attachment] and (3) Agency position on exposure limits and risk factors applicable to the Holloman Sewage Lagoons, [ref: para 5d., Attachment].

Please feel free to contact Mr Brent Johnson or myself to discuss any of these issues. I may be contacted at Comm (804) 764-7651.

A handwritten signature in cursive script that reads "Craig Anderson".

CRAIG ANDERSON , Lt Colonel, USAF  
Director of Environmental Law

1 Atch  
Memo for Record, 31 Jan 91

ATCH 3



**DEPARTMENT OF THE AIR FORCE**

HEADQUARTERS TACTICAL AIR COMMAND  
LANGLEY AIR FORCE BASE VA 23665

19 March 1991

Dr Bruce Swanton  
Hazardous Waste Bureau  
Environmental Improvement Division  
New Mexico Health and Environment Department  
1190 St. Francis Drive  
Santa Fe, New Mexico 87503

Dear Dr Swanton

We are providing an attached copy of the minutes from our 31 January 1991 meeting in Santa Fe, NM. We consider this action to be in fulfillment of the Air Force commitment to prepare the meeting minutes. We request that you sign and return a copy to us. If you wish to make editorial comments please respond by Telefax or voice to Mr Brent Johnson, HQ TAC/DEVC, FAX (804) 764-5363, Voice (804) 764-4430. We have also sent a copy of the minutes to EPA Region VI for their concurrence.

We hope that you have had an opportunity to review our Draft Sampling and Analysis Plan Outline, submitted 28 February 1991, [ref: para 5e., Attachment]. We have positioned ourselves to move quickly toward development of an approved Sampling and Analysis Plan such that we may take advantage of current year funds to accomplish this task.

Please feel free to contact Mr Brent Johnson or myself to discuss any of these issues. I may be contacted at Comm (804) 764-7651.

A handwritten signature in cursive script, reading "Craig Anderson", is positioned above the typed name.

CRAIG ANDERSON , Lt Colonel, USAF  
Director of Environmental Law

1 Atch  
Memo for Record, 31 Jan 91

MEMORANDUM FOR RECORD

1. REGARDING: Meeting on 31 January 1991
2. SUBJECT: Holloman Sewage Treatment Lagoons
3. LOCATION: Hilton Hotel, Santa Fe, New Mexico
4. PERSONNEL CONTACTED: (see attached listing)
5. IMPORTANT POINTS:

a. This meeting was requested by the Air Force as a follow up to the meeting on 4 Jan 91 with EPA Region VI in Dallas, TX. At the Dallas meeting, Holloman (HAFB) proposed to comply with the Federal Facilities Compliance Agreement (FFCA), signed 20 December 1988, by meeting the requirements of a "clean closure" as referenced 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 265, published in 52 FR 8704, March 19, 1987.

b. EPA Region VI, delivered a draft Clean Closure Requirements Document dated January 1991. Ms Ellen Graber, EPA, explained the contents of the document as follows: (1) the draft document is guidance, not regulation, and is intended to provide a basic frame work for HAFB to prepare an approvable closure plan; (2) risk-based closure levels are defined as the strictest standard, applying direct ingestion considerations and (3) risk-based closure levels for carcinogens must be established for the more stringent risk level of  $10^{-6}$ .

c. Dr Bruce Swanton, New Mexico Environmental Improvement Division (NMEID) stated that if hazardous constituents are present in ground water, clean closure would no longer be an option to HAFB. EPA's evaluation of monthly and semiannual sampling events indicates a statistically significant increase in Total Organic Carbon (TOC) between upgradient and downgradient wells such that HAFB must begin groundwater assessment monitoring. Discussion of this issue resulted in the following action: Air Force will be given EPA's evaluation of the statistically significant increase in TOC. Within 7 days of receiving EPA's data, the Air Force will either certify that Air Force data is correct or, notify EPA of a statistical increase in TOC and proceed with preparation of a ground water assessment monitoring plan.

d. Mr Brent Johnson, Air Force, asked EPA and NMEID if any physical characteristics such as location and quality of naturally occurring groundwater, soil conditions and climate may be considered in assessing risk and determining "site-specific" cleanup standards vice those which are cited in the EPA draft Clean Closure Requirements Document. Dr Swanton responded that the state interprets the meaning of "site-specific" such that certain physical characteristics unique to a given site may not be factored into a risk assessment such that alternative, presumably less stringent, cleanup standards may be derived for a particular site. Further discussion of this matter resulted in the following action: EPA will conduct a literature search and consult its higher headquarters to investigate Agency-recommended exposure limits and risk factors to determine their degree of flexibility on

constituent cleanup standards applicable to the Holloman Sewage lagoons. EPA will provide a written position on this matter to the Air Force within four weeks.

e. Lt Col Craig Anderson, Air Force, suggested that the Air Force proceed with preparation of a sampling and analysis plan which would satisfy the requirements for a site-specific demonstration of a Clean Closure for surface impoundments. Further discussion of this matter resulted in the following action: Within 30 days, Air Force will submit an outline for a proposed sampling and analysis plan. EPA shall have 30 days to review and provide comments to the Air Force on the proposed sampling and analysis plan for the Holloman sewage lagoons.

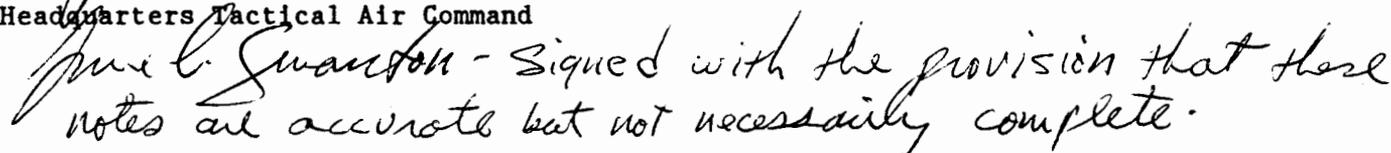
f. Mr Thomas O'Brien, Fish and Wildlife Service (FWS), indicated that the FWS is concerned about the potential effects of bioaccumulation of hazardous constituents in lake organisms and migratory waterfowl that inhabit Lakes Holloman and Stinky. FWS requested that the Air Force support a study to address their concerns. Dr Swanton, NMEID, indicated that FWS concerns are not subject to enforcement under the current closure actions; however, Dr Swanton recommended that the Air Force respond to FWS concerns.

g. Mr Brent Johnson, Air Force, offered to draft meeting minutes. Discussion of this matter resulted in the following action: Within 7 days Air Force will prepare meeting minutes and distribute copies to the attendees.

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



CRAIG ANDERSON, Lt Colonel, USAF  
Director of Environmental Law  
Headquarters Tactical Air Command



*Dr Bruce Swanton - Signed with the provision that these notes are accurate but not necessarily complete.*

DR BRUCE SWANTON, Supervisor Enforcements  
Hazardous Waste Bureau  
Environmental Improvement Division  
New Mexico Health and Environment Department

MR MARK POTTS, Chief ALONM Section  
U.S. Environmental Protection Agency, Region VI



U. S. Army Corps of Engineers  
Omaha District, Environmental Branch

Meeting Attendance List

Date: 1/31/91 Time: 1:00pm Location: Santa Fe, NM

Topic: Holloman AFB Sewage Lagoons

NAME	TITLE/POSITION	ORGANIZATION	PHONE/FAX
Craig Anderson	Environmental/Law	HQ TAC/JA	(804) 764-7651 AV 574-7651
BRENT JOHNSON	ENV ENGR	HQ TAC/DEVC	(804) 764-4430 DSN 574-4430
SHARON MOORE	Ch, Envmtl Plan Br	833 CSG/DEV <del>HQ</del> Holloman AFB, NM	(505) 479-3931 DSN 867-3931
HOWARD E. McFEET	DEP BASE ENGR	833 CSG/DE HOLLAMAN AFB	505-474-3071 DSN- 867-3071
JOHN F. SFURLIN	DEPUTY STAFF JUDGE ADVOCATE	833 AD/JA	505-474-7216 DSN 867-7216
Mark Potts	Chief ALONM Section EPA RC	EPA	(214) 655-2192
CARLOS A. ZEQUEIRA	ASSISTANT REGIONAL COUNSEL	EPA - REGION 6	(214) 655-2120 FAX (214) 655-2182
Ellen Gruber	Closure Section Environmental Scientist	EPA - Region 6	(214) 655-6790
COURTNEY FESMIRE	ENFORCEMENT OFFICER	EPA - Reg 6	(214) 655-2192
Tracy HUGHES	Assistant GENERAL Counsel / Office of General Counsel	NM EID	(505) 827-2987
KATHLEEN M. SIMONOS	Chief Hazardous Radioactive Waste Div.	NM EID	(505) 827-2959 FAX (505) 827-2836
Bruce Swanton	Supervisor, Inspect Enforc. / NWRTS	NM EID	(505) 827-2898
ED LOPEZ	REGIONAL ENV. OFFICER	USAF	214-653-3340
RON-JAHNS	REGIONAL ENV. OFC.	USAF	214-653-3377
Jean R Resnick	Hazardous Materials Mgmt. Coord	BLM	fax to office 505-525-8228





DEPARTMENT OF THE AIR FORCE

HEADQUARTERS 833D COMBAT SUPPORT GROUP (TAC)

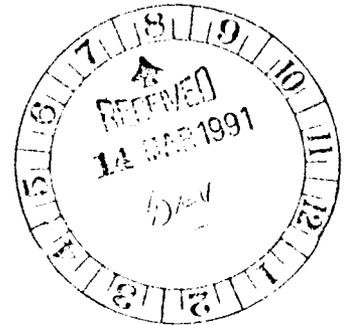
HOLLOMAN AIR FORCE BASE, NM 88330-5000

RECEIVED  
EPA REGION VI  
91 JAN 23 PM 12:16  
HAZARDOUS WASTE MGMT. DIV  
15 JAN 1991

REPLY TO  
ATTN OF DE

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

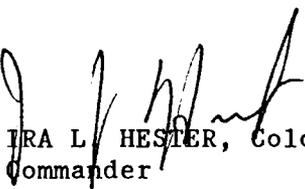
TO Mr Allyn M. Davis  
Director  
Hazardous Waste Management Division (6H)  
USEPA Region VI  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733



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.

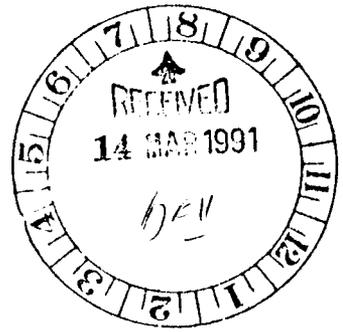
  
IRA L. HESTER, Colonel, USAF  
Commander

Atch  
Memorandum of Record  
  
cc: w/Atch  
See Distribution List

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ATCH 2

MEMORANDUM FOR RECORD



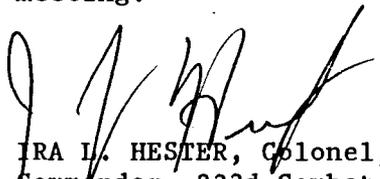
1. REGARDING: Meeting on 4 Jan 1991
2. SUBJECT: Holloman Sewage Treatment Lagoons
3. LOCATION: EPA Region VI; Dallas, Texas
4. PERSONNEL CONTACTED: (see attached listing)
5. IMPORTANT POINTS:

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 Management Division

DISTRIBUTION LIST

cc/with attachment

Attn: Mr. Courtland Fesmire, (2 copies)  
US Environmental Protection Agency, Region VI, 6H-CS  
First Interstate Bank Tower  
1445 Ross Avenue  
Dallas, Texas 75202-2733

Attn: Dr. Bruce Swanton, (1 copy)  
Hazardous Waste Bureau  
Environmental Improvement Division  
New Mexico Health and Environment Department  
1190 St. Francis Dr.  
Santa Fe, New Mexico 87503

Attn: Mr Mark Pcycke, Assistant Regional Counsel, (1 copy)  
US Environmental Protection Agency, Region VI, 6C-H  
First Interstate Bank Tower  
1445 Ross Avenue  
Dallas, Texas 75202-2733

Attn: Capt John Spurlin, (1 copy)  
833 AD/JA  
Holloman AFB, NM 88330

Attn: LtCol Anderson, (1 copy)  
HQ TAC/JA  
Langley AFB, VA 23665

Attn: Brent Johnson, (1 copy)  
HQ TAC/DEV  
Langley AFB, VA 23665

Attn: Larry Janis, (1 copy)  
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Omaha, NE 68102-4978

Attn: Ed Lopez, (1 copy)  
U.S. Air Force  
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525 Griffin St  
Dallas, TX 75202

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8501 Mo-Pac Blvd  
Austin, TX 78720-1088

*Col Ira Maslar*

*Ben Johns (AFBCL - Dallas)*