Compliance Agreement Quarterly Report

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)
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 FFCA be changed from Boyd Hamilton to Dr Bruce Swanton.


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.
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.

CRAIG ANDERSON, Lt Colonel, USAF  
Director of Environmental Law

1 Atch  
Memo for Record, 31 Jan 91
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.

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

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

MR MARK POTTS, Chief ALOHM 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  

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<th>TITLE/POSITION</th>
<th>ORGANIZATION</th>
<th>PHONE/FAX</th>
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<tr>
<td>Craig Anderson</td>
<td>Environmental Law</td>
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<td>(804) 764-7651 AV 574-7651</td>
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<tr>
<td>Brent Johnson</td>
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<td>Mark Rottl</td>
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<td>Assistant Regional</td>
<td>EPA - Region 6</td>
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<td>Ellen Gruber</td>
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<td>Tracy Hughes</td>
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<td>Keith M. Stoner</td>
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<tr>
<td>Ron-Jahns</td>
<td>Regional Env. Org.</td>
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<td>Joan R Resnick</td>
<td>Hazardous Materials</td>
<td>BLM</td>
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U. S. Army Corps of Engineers
Omaha District, Environmental Branch

Meeting Attendance List

Date: __________  Time: __________  Location: __________

Topic: Same

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<td>Mike Howard</td>
<td>Wildlife Biologist</td>
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<td>Thomas F. Breen</td>
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<td>Richard Roy</td>
<td>Contaminant Biologist</td>
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<td>Jane Hixson</td>
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<td>Radian Corp</td>
<td>451-4978</td>
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<td>Wallace Hise</td>
<td>Project Mgr</td>
<td>Radian Corp</td>
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<td>Commander</td>
<td>833 Combat Support Group</td>
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CLOSURE PLAN -- SEWAGE TREATMENT LAGOONS, HOLLOMAN AFB, NM

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

Memorandum of Record

cc: w/Atch
See Distribution List

Readiness is our Profession
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 is 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)
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Environmental Improvement Division
New Mexico Health and Environment Department
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Santa Fe, New Mexico 87503

Attn: Mr Mark Pcycke, Assistant Regional Counsel, (1 copy)
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Holloman AFB, NM 88330

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

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Col Ian Bicker

Roy Johnson (AFRCA-DATA)