

file HAFB BLU 91 *Called 5/9*

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FROM: Brent Johnson
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SUBJECT: Holloman Sewage Treatment Lagoons

9 May 91

Bruce —
 The attached letter from Lt Col Robbline to Dr Allyn Davis
 is provided to keep you in the loop of communication
 between HQ TAC and EPA.

Brent Johnson

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

06 MAY 1991

Dr. Allyn M. Davis
Director, Hazardous Waste Division
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas TX 75202-2733

Dear Dr. Davis

I'm glad we had a chance to meet and briefly discuss the most recent developments concerning a fix for the Holloman lagoons. I'm also glad I was there to hear your candid (and equally unflattering) assessment of the relationship which apparently exists between Region VI and our bases in New Mexico. While I'm new to TAC and to this job, you have years of experience dealing with Holloman and Cannon and, for whatever reasons, have been "underwhelmed" by past events and/or personalities. I believe that the current senior leadership and members of the environmental teams at both Holloman and Cannon AFBs are eager to change your perception regarding TAC's willingness (and desire) to get on with cleaning up our bases, maintaining a program of total environmental compliance, and initiating aggressive pollution prevention and waste minimization programs. We clearly cannot achieve these goals unless there is a spirit of cooperation and trust among all the players, and I intend to work with the leadership of our bases to promote that cooperation and trust.

Colonel [redacted] and his staff at Holloman are orchestrating a meeting with New Mexico authorities to clarify the recent change in their state policy regarding closure of certain hazardous waste units and, in particular, to discuss our course of action concerning Holloman's sewage lagoons. Once we have established a time and place for the meeting, my action officer, Mr Brent Johnson, will contact you through Dr Graber as you recommended. Among the issues we would like to see addressed are the "acceptable" effluent standard which a new sewage treatment plant must meet, the state's willingness to delay closure pending construction of a new sewage treatment plant, and Holloman's status as a "non-complier." A definitive list of our questions concerns will be provided to you and the state in advance of the meeting.

As you know, some items remain outstanding from the 31 Jan 91 meeting in Santa Fe.

a. Review comments on our Draft Sampling and Analysis Plan Outline, submitted to Region VI on 28 Feb 91. Per the agreement, EPA comments were to be sent to us by 30 Mar 91.

b. Comments concerning the statistically significant increase in total organic carbon in Holloman's groundwater.

c. Results of EPA's research into the matter of Agency-recommended exposure limits and risk factors to determine their degree of flexibility on constituent cleanup standards applicable to the Holloman lagoons. A written position on this issue was to have been submitted to us within four weeks of the 31 Jan meeting.

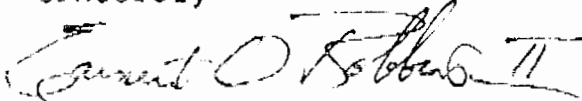
d. A signed copy of the Memorandum of Record concerning the decision/agreements made during the 31 Jan meeting.

It may be that the need for some of these has been overcome by events, but until all parties convene again we are uncertain as to what is/is not specifically required. Our belief is that once we have the above info from Region VI we will be much better prepared for the next meeting with the state and your staff and better able to finally decide upon a course of action which will satisfy all parties. If any or all of the above cannot be provided, I would appreciate a call from Dr Graber to Ms Sharon Moore, our Environmental Coordinator at Holloman, so we can proceed accordingly. Ms Moore can be reached at (505) 479-3931.

Finally, I want to initiate discussions aimed at satisfying the commitment Mr Vest made to establish a "model program" involving Holloman, Cannon, and Kirtland AFB's. I am contacting my counterpart at Military Airlift Command headquarters ("owners" of Kirtland) to advise him of Mr Vest's offer. Since Mr Vest suggested this initiative in response to your comments regarding a need for such a focused effort at Holloman and Cannon, I am entirely open to your suggestions concerning what needs to be done and how we might best proceed. I have asked my staff to consult with the environmental offices at the bases to formulate our ideas/needs. I promise full cooperation in any initiative which will speed up cleanup actions, has the potential to achieve better return for the dollar, or improves our ability to comply with EPA and/or state environmental laws and regulations. I look forward to hearing from you concerning this initiative and am prepared to return to Dallas for further discussion.

Thanks again for meeting with us last week. I hope you will be able to help us in making our TAC bases leaders in the federal facilities environmental arena.

Sincerely



ERNEST O. ROBBINS, II, Lt Col, USAF
Director, Environmental Programs

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