



State of New Mexico
ENVIRONMENT DEPARTMENT
 Harold Runnels Building
 1190 St. Francis Drive
 Santa Fe, New Mexico 87503

FILE HAFB
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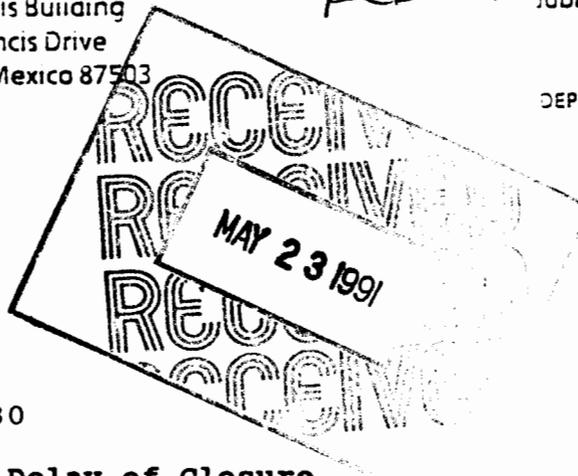
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May 22, 1991

Colonel Ira L. Hester
 Base Commander
 Holloman Air Force Base
 833 Combat Support Group
 Holloman Air Force Base, NM 88330



**RE: Permit Application for Delay of Closure
 NM6572124422**

Dear Col. Hester:

The Hazardous and Radioactive Waste Bureau (HRWB) of the New Mexico Environment Department (NMED), together with the U.S. EPA, has agreed that it is appropriate that Holloman Air Force Base (HAFB) submit a post-closure care permit (PCCP) application for the sewage lagoon system which services HAFB. HRWB agrees that it will be appropriate to include in the application a delay of closure under HWMR-6, Part V, 40CFR §264.113. The PCCP application must include both a closure plan and a post closure care plan.

HWMR-6 was adopted by NMED on March 13, 1991. The application for continued use of RCRA units for receiving non-hazardous wastes under delay of closure must be submitted no more than ninety (90) days from the date these regulations became effective. The final date on which a Part B application can be accepted is June 11, 1991.

The subject application must include, at a minimum, the following sampling program for the lagoon system:

1. Lagoons D, E, and G must be sampled as follows:

Eight samples must be taken radially around the inflow point to each unit, four at a depth below the surface of the sludge layer equal to one-third of the total sludge layer thickness and four samples at a depth below the sludge layer equal to two-thirds of the total sludge layer thickness. These twenty-four (24) samples must be analyzed for all parameters which have been identified at or above the Practical Quantitation Limit in any

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previous lagoon water, soil or sludge sample. The twelve (12) samples taken at the lower sludge layer depth must also be analyzed for all SW-846 Method 1311 Toxic Characteristic Leaching Procedure (TCLP) parameters. In addition, all eight (8) samples collected from lagoon D must be analyzed for the complete list of parameters in SW-846 methods 8015 and 8280.

2. Three samples must be taken from the sump ("F") between four and five feet from the inflow point and at a depth of two-thirds the total thickness of the sludge layer. These must be evaluated for SW-846 Method 1311 Toxic Characteristic Leaching Procedure (TCLP) parameters by the procedure given in Appendix II to 40CFR §261.
3. Five samples each must be taken in Lakes Holloman and Stinky from the surface of the sediment layer and no more than six (6) inches below the surface of this layer. These must be analyzed for the complete list of parameters in Appendix IX to 40 CFR §264.
4. HAFB must commit to a semi-annual detection monitoring program to include all RCRA monitor wells in which these wells will be analyzed for SW-846 Method 8240 volatile constituents and PCBs, and a compliance monitoring program which includes quarterly sampling of all RCRA wells for Appendix IX parameters. The waters in Lagoons A and B must be sampled quarterly for SW-846 Method 8240 volatile and Method 8270 semivolatile constituents. The sampling program must continue as long as the lagoon system is in operation.
5. HAFB must commit to a contingency plan which must include increased frequency and intensity of monitoring and/or an accelerated corrective action program in the event that a release is detected at any time in the future. To this end, HAFB's permit application must specify those delay of closure procedures which will result in compliance with all requirements set forth in §§264.113(d) and 113(e).

HAFB must implement the sampling program detailed in items 1-3, above, such that data will be available during the HRWB evaluation of the permit application. Based on this data, HRWB will determine whether the sludges currently in place in the lagoon and playa lake system present a threat to the public health or the environment, and, if necessary, will require removal to the extent practicable of any such material.

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If you have any questions regarding these matters, please contact me at (505) 827-2211.

Sincerely,

Dr. Bruce A. Swanton, Compliance Supervisor
Hazardous and Radioactive Waste Bureau (HRWB)

cc: Kathleen M. Sisneros, NMED Division Director
Benito J. Garcia, HRWB Chief
Tracy Hughes, Office of General Counsel
Ellen Graber, U.S. EPA VI (6H-PC)
Mike Donahoo, U.S. Fish and Wildlife Service
Dave Schafersman, Bureau of Land Management

fax: Sharon Moore, HAFB Environmental Engineers