



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

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DALLAS, TEXAS 75202-2733

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JUN 20 1991

Sharon Moore
Environmental Planning Bureau
833 CSG/DEV
Holloman Air Force Base, New Mexico

Re: Soil and sludge sampling and analytical needs for establishing "practicable" removal levels at the Sewage Lagoons

Dear Ms. Moore:

This letter outlines sampling and analytical needs identified by the U.S. Environmental Protection Agency (EPA), explained in a telephone conversation on June 18. These requirements supplement those specified by Bruce Swanton of the New Mexico Environment Division (NMED) in his recent letter. As discussed, soil and sludge need to be analyzed for organic carbon content.

EPA and NMED will use fate and transport calculations to determine the permissible levels of contamination in the sewage lagoons during the delay of closure. In turn, the permissible levels will dictate the amount (if any) of sludge to be removed to meet the regulatory requirement of "removal to the extent practicable." To perform these calculations, certain data are needed which are not yet available. In particular, we need to know the soil and sludge organic carbon contents, and the soil mineralogy.

Specifically, we need two 20 to 25 foot boreholes, one each downgradient of lagoons A and D, near monitoring wells MW-8 and MW-3. Soil samples from distinct lithologic units or, if uniform lithologically, every five feet, will suffice. These samples should be analyzed for organic carbon content and characterized for mineralogy. In addition, we need to know the organic carbon content of sludge from lagoons D and G, and, if possible, either A or B. Two samples from the lower portion of the hot spot in each lagoon are needed.

EPA appreciates your readiness to undertake this sampling and analysis. If you need further details, please contact Dr. Ellen Graber of my staff at (214) 655-6790.

Sincerely,



Laurie Burch, Chief
Closure Section
RCRA Permits Branch

cc: Brent Johnson
HQ TAC/DEVC
Langley AFB, VA 23665

✓ Bruce Swanton, NMED