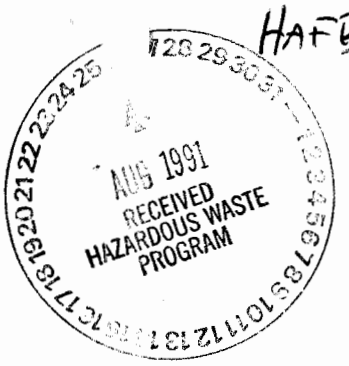
HAFB BLU 91



AUG 2 0 1991

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Colonel Ira L. Hester
Base Commander
833 CSG/CC
Holloman Air Force Base, NM 88330-5000

Re: Ground Water Quality Assessment Plan for Sewage Treatment Lagoons

ENTERED

Dear Colonel Hester:

The Environmental Protection Agency (EPA) and New Mexico Environment Department (NMED) have completed their review of your Ground Water Quality Assessment Plan for the Sewage Treatment Lagoons. The plan was submitted in response to the Federal Facilities Compliance Agreement, Part IV Corrective Measures, Section C, number 13. The plan needs to be revised to reflect our joint comments, enclosed. The revised assessment plan is due three weeks from the receipt of this letter.

EPA is planning to split samples with Holloman Air Force Base during the first assessment round. We will be ready to sample the wells the first week of September or the final week of August. Please have your staff contact Barry Feldman of my staff at (214) 655-6790 to confirm a sampling schedule and to answer any other questions.

Sincerely yours,

Randall E. Brown
Chief
RCRA Enforcement Branch

Enclosure

cc: √ Dr. Bruce Swanton, NMED (w/enclosure)
Ms. Sharon Moore, 833 CSG/DEV (w/enclosure)

bcc: BILL HONKER, 6H-P (w/enclosure)

6H-PC:GRABER:erg:6790:7/30/91:ERG LAN DISK 1.5:DOC:GWPLAN.5
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COMMENTS ON THE GROUND WATER ASSESSMENT
MONITORING PLAN FOR THE SEWAGE TREATMENT LAGOONS
HOLLOMAN AIR FORCE BASE (HAFB), NM

1. Solute transport calculations which include sorption/desorption phenomena require data on the organic carbon content of soils and aquifer materials. This critical data is not currently available, and plans should be made to obtain it.

2. Continuous core should be recovered and logged by a geologist for all boring operations.

3. According to our files, neither Table 7-1, Analytes Detected in Soil or Sludge Samples Collected from Ponds A, B, and C, nor Table 7-2, Analytes Detected in Surface Water Samples Collected From the Sewage Treatment Lagoons, is complete. Tables 7-1 and 7-2 must be revised to accurately reflect all constituents currently and historically detected in the soils, sludges, and waters of the sewage treatment lagoons, Lake Holloman, and Lake Stinky.

4. Total Cyanide (9012) and Total Sulfides (9030) should be added to the parameter list.

5. Concentration levels should be reported to method detection limits (MDLs) rather than practical quantification limits (PQLs).

6. Additional wells, if required, should be constructed from PVC rather than stainless steel due to the high salinity of the ground water. However, in areas where the salinity of the ground water does not justify the use of PVC, stainless steel wells will be required.

7. The sampling and analytical activities to be undertaken if any hazardous constituents are detected in the ground water should be clarified. The regulations require quarterly re-sampling of the wells. Will only those parameters detected, or will all Appendix IX parameters, be analyzed for during the immediate re-sampling?