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GOVERNOR

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ENVIRONMENT DEPARTMENT
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HAFB

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December 17, 1991

General Lloyd Newton
Installation Commander
Holloman Air Force Base
49th CES/CEV
Holloman Air Force Base, NM 88330

RE: 1. November 1991 "A-E Sampling and Quality Control. . ."
2. November 5, 1991 "Draft Sampling and Quality Control. . ."
NM6572124422

Dear Col. Newton:

The Hazardous and Radioactive Materials Bureau (HRMB) has reviewed subject documents 1 and 2. The data prompts HRMB to require that Holloman Air Force Base resample the sewage lagoon RCRA monitoring wells and characterize the samples by the following methods for the stated reasons:

1. Method 8080, due to the detection of several target compounds in this method.
2. Method 8240, due to the presence of methylene chloride and acetone in samples and in trip blanks. HRMB cannot dismiss the possibility that these method 8240 compounds are present in groundwater downgradient of the lagoon system simply because they appear to be common contaminants at the laboratory in question.
3. Method 8270, for two associated reasons. Subject document 2 reports 2-butanone at 25 ppb and 4-methyl-2-pentanone at 31 ppb in MW-3, both compounds detected at levels below the Practical Quantitation Limit (PQL) but presumably above the Method Detection Limit (MDL) as defined below. HRMB questions the analytical limits used in this study. HRMB requested that EPA require HAFB to use Method Detection Limits (MDLs) rather than Practical Quantitation Limits (PQLs) in this assessment project. It was HRMB's understanding that HAFB had agreed to this. HRMB did not notice that the values in Appendix B of the "Analytical Plan for Groundwater Assessment Monitoring" (August 1991) corresponded to PQL's rather than MDL's. The MDL is that level of a target parameter in a sample at which the laboratory can report with 99% confidence that the sample does contain the parameter in question. HRMB concludes from the data in subject document 2 that 2-butanone and 4-methyl-2-pentanone exist in groundwater downgradient of the sewage lagoon system.

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If you have any questions regarding this matter, please contact Dr. Bruce Swanton of my staff at (505) 827-4300.

Sincerely,

A handwritten signature in cursive script, appearing to read "Edward Horst". The signature is written in black ink and is positioned above the typed name.

Edward Horst, RCRA Programs Manager
Hazardous and Radioactive Materials Bureau

cc: Tracy Hughes, Office of General Counsel
Rick Roy, U.S. Fish and Wildlife Service
Dave Schafersman, Bureau of Land Management
Wallace Hise, Project Director, Radian