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M E M O R A N D U M

TO: Barbara Hoditschek, Permitting Program Manager  
FROM: Steve Alexander, Technical Section Supervisor  
THROUGH: Edward Horst, Enforcement and Technical Program Manager  
DATE: August 12, 1992  
SUBJECT: Proposed Sewage Lagoon Project for Holloman AFB, August 3, 1992

The following review was conducted on the "Groundwater Assessment Monitoring" section. Quotes in parenthesis are taken directly from the text. Technical comments follow the quotes.

- 1 Page 3, 1. Reactor Well Installation and Sampling: (A full screen will be conducted using the HydroPunch technique...). A complete Sampling and Analysis Plan including constituents, quality assurance/quality control and a description of the HydroPunch method will be required.
- 2 Page 3, 1. Monitor Well Installation and Sampling: (The complete monitor well network will be sampled twice for...). A listing of the actual wells to be sampled must be provided.
- 3 Page 3, 1. Monitor Well Installation and Sampling: (At this time Holloman AFB believes that analysis for Appendix IX constituents is not warranted for proposed new wells...). All new groundwater monitoring wells must be sampled and analyzed for all Appendix IX constituents.
- 4 Page 3, 3. Sample Deep Piezometers: (Procedures will include developing and sampling existing deep piezometers.). In which flow zone and/or aquifer does "deep" refer to?

Review  
August 11, 1992  
page 2

- 5 Page 4, 5. Submit Alternate Concentration Limit Petition:  
(The ACLs will be used as "trigger" levels to determine when further action is required.). No regulatory provision exists for facilities under 40 CFR Part 265: Interim Status to submit an Alternate Concentration Limit (ACL) petition. Under 40 CFR, Section 265.90(d) HAFB may propose an alternate groundwater monitoring system which would incorporate information obtained from the organochlorine pesticide assessment process and the changes proposed in the May 1992 letter: "HAFB: Lagoon Groundwater Assessment Monitoring Results", which requested changes to the detection monitoring program. Bureau review of a proposed alternate groundwater monitoring system would follow completion of the ongoing organochlorine pesticide assessment process.