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August 17, 1992

Mr. Howard E. Moffitt
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Holloman AFB, New Mexico 88330-5000



The Permitting Program of the Hazardous and Radioactive Materials Bureau (HRMB) has received Holloman AFB's 03 August 92 letter regarding the Proposed Sewage Lagoon Project and has the following preliminary comments. Clean closure demonstrations for surface impoundments are evaluated against requirements in the HWMR-6, Part IV, Section 40 CFR 265.228, associated Federal Registers and relevant guidance documents and policy directives. Prior to approval of any proposed approach for closure and/or corrective action, the Permitting Program will need more detailed information.

The following comments by the Permitting Program are based on review of the "Sewage Lagoons (Ponds A-G Closure)" Section. Comments by the Technical Section regarding the "Groundwater Assessment Monitoring" are attached. The portions of text in parentheses are taken directly from the text. HRMB comments follow the quotes.

ITEM

1. Page 1, opening paragraph: (Holloman AFB intends to pursue the "closure by demonstration" option as described in the preamble to the 19 March 1987 Federal Register.) The 19 March 1987 Federal Register outlines requirements for "closure by removal" or "clean closure demonstration". To obtain NMED certification for this type of closure, HAFB must demonstrate, once the vertical and horizontal extent of contamination is known, that no hazardous constituents remain in any media above Health-Based Action Levels. Media contaminated with metals must be cleaned up to background concentrations. As described in the 19 March 1987 Federal Register, these demonstrations must be waste specific and site specific, assume no attenuation, and consider all potential exposure pathways. The other proposed closure option discussed in the preamble has never been finalized.

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2. Page 4, number 5: (Submit Alternate Concentration Limit Petition) Your 03 August 92 letter does not clarify how HAFB intends to close the sewage lagoons. In the case of closure by removal of all lagoons, no post-closure permit is required and no groundwater monitoring is necessary; thus there is no need to petition for Alternate Concentration Limits. Closure by removal requires that the lagoons be taken out of service, cleaned, sampled, certified, and NMED-inspected. Once the certified closure is approved by NMED, the units may be reopened to receive non-hazardous waste. HAFB would also need to monitor influent to ensure that no hazardous waste enters the units.

If HAFB intends to close some of the lagoon units by removal and others by leaving the waste in place, NMED will require a detailed proposal describing how the "waste-in-place" lagoons will be isolated and properly monitored. This is necessary in order to determine the source of any potential releases to the environment.

Our technical review of HAFB's Post-Closure Care Permit Application for Surface Impoundments (6/91) has not begun and is not scheduled for FY-93. Any changes necessitated by HAFB's plans for the impoundments that are not reflected in the 6/91 post-closure permit application may be incorporated without any permit modifications. HAFB must have the groundwater plume defined and a groundwater monitoring program in the permit application.

If you have any questions regarding this response, please contact Ms. Stephanie Stoddard or Mr. Steve Alexander at (505)827-4308 or 827-4313.

Sincerely,



Ms. Barbara Hoditschek
RCRA Permit Program Manager

Attachment.

xc with attachment: David Morgan, NMED
Thomas Manning,
Air Force Center for Environmental Excellence