



DEPARTMENT OF THE AIR FORCE

HEADQUARTERS 49TH FIGHTER WING (ACC)
HOLLOMAN AIR FORCE BASE, NEW MEXICO

file
HafB
Red 92

LXII

17 SEP 1992

FROM: 49 CES/CEV
550 Tabosa Avenue
Holloman AFB, New Mexico 88330-8458

SUBJ: Holloman Air Force Base (HAFB) Lagoons: Sediment and Sludge Contamination

TO: Ms Stephanie Stoddard
Hazardous & Radioactive Materials Bureau
New Mexico Environmental Department
525 Camino de los Marquez
Santa Fe, NM 87502-6610



1. Please find enclosed the Site Characterization Report and the AE-SQCSR for the 1992 study of contamination of the sludge and sediments in Holloman AFB (HAFB) sewage lagoons C-G, Lakes Holloman and Stinky, and associated drainage ditches (Atch 2, 3). Also enclosed are data from Lagoon C collected previously during 1990-91 but not reported in the A-E SQCSR of June 1991 (Atch 4). These data are submitted to NMED to support the Post-Closure Care Permit (PCCP) application and are submitted to USEPA as part of the Phase I, RCRA Facility Investigation (RFI), of Solid Waste Management Units (SWMUs) identified on Table 1 of the HSWA portion of HAFB's RCRA Part B permit.

2. The lagoon C-G sludge and sediment data were collected in response to a letter from Dr Bruce Swanton of NMED Hazardous and Radioactive Materials Bureau (HRMB), dated 22 May 1991, to Col Ira L. Hester, Commander, 49th Support Group of HAFB (Atch 5). In this letter, Dr Swanton identified a five-item sampling program, of which three items were required to complete technical review of the HAFB's Post-Closure Care Permit (PCCP) application. A conceptual plan to address these items was presented in November 1991 and accepted by NMED and USEPA; the enclosed data fulfill these requirements. As originally planned, these data would complete the PCCP, which would now be ready for technical review during FY93.

3. HAFB proposes to postpone technical review of the PCCP until FY94, in order to supplement the plan with a detailed feasibility study of closure alternatives. Several studies will provide information for the feasibility study, including: (1) collection of surface water samples analyzed for what is now recognized as the most significant contamination in the lagoons, organochlorine pesticides; (2) an analytical study of contamination of biota not previously characterized by the US Fish and Wildlife Service study, including benthic organisms, algae, and fish; (3) a statistical study to determine if the existing data adequately characterize the contamination; and (4) a detailed assessment of the health and environmental risk of the lagoons. These studies, as well as additional studies of Lake Stinky soils, will also supplement the HSWA RFI investigation.

4. A disadvantage to postponing technical review is that HAFB paid a \$28,000 permit fee at the end of FY91 to fund the technical review and permit preparation (Atch 6). This fee should be applied towards this task, even if it is delayed until FY94. HAFB requests that NMED provide notification if the proposed delay of technical review will jeopardize the availability of these funds.

5. The two remaining items in Dr Swanton's 22 May letter are monitoring requirements for post-closure care and are not addressed by the enclosed reports. One is a requirement to initiate a groundwater detection monitoring program. This is also required by the FFCA; HAFB currently has a monitoring network of 10 wells and is preparing to install 5 more as part of an assessment monitoring project. These efforts will fulfill the stated requirement.

6. The last requirement of Dr Swanton's letter was to initiate a program of surface water sampling in lagoons A and B for volatile and semi-volatile organic compounds. HAFB believes that new data and events, since May 1991, make this requirement unnecessary. Most importantly, all data collected since that time point to organochlorine pesticides and PCBs as the contaminants of concern. (The presence of PCBs has been confirmed only in lagoons A and B.) Surface water samples are most useful for detecting ongoing contamination. HAFB currently does not discharge hazardous wastes into the lagoons, and none of the detected pesticides or PCBs are currently in use on base. Judging from recent groundwater and sludge samples, known past discharges of volatile and semi-volatile organics appear to have long since volatilized. Finally, HAFB no longer intends to use the lagoons as part of the new wastewater treatment system, so there will be no water to collect during the post-closure care period. Therefore, an expensive surface water monitoring program for volatile and semi-volatile organics appears to be unjustified.

7. In summary, HAFB wishes to include the enclosed reports as part of its PCCP application, and requests an official letter of concurrence from NMED, accordingly. HAFB wishes to delay technical review of the PCCP until FY94 because several recently initiated studies will impact the application. It is our understanding that our PCCP is not scheduled for technical review during FY93 and we do not wish to change this. We request that NMED officially notify us of the appropriate time to request review of our application during FY94 so that we may be assured a place on NMED's work plan. HAFB is also submitting the enclosed reports to USEPA as part of our RFI for Table 1 of our HSWA Part B permit, the rest of which was previously submitted during July 1992.

8. If you have any questions, please contact Dr Fred M. Fisher, 49 CES/CEV, HAFB, at (505) 479-3931.


HOWARD E. MOFFITT
Deputy Base Civil Engineer

6 Atch

1. Distribution List
2. Site Characterization Report
3. A-E SQCSR Report, Jun 91
4. A-E SQCSR Rpt, Aug 92
5. NMED Ltr to 49 SG/CC, 22 May 91
6. Permit Fee

Distribution List

cc w/Atch 5 only

Mr Rich Mayer
US Environmental Protection Agency, Region VI, 6H-CS
First Interstate Bank Tower
1445 Ross Avenue
Dallas, TX 75202-2733

Mr Mark Peycke
US Environmental Protection Agency, Region VI, 6C-H
First Interstate Bank Tower
1445 Ross Avenue
Dallas, TX 75202-2733

Mr Scott Ludwig
US Department of the Interior
Bureau of Land Management
1800 Marquess
Las Cruces, NM 88005

Mr Steve Alexander
New Mexico Environment Department
Hazardous & Radioactive Materials Bureau
525 Camino de Los Marquez
Santa Fe, NM 87502-6610

Mr Barry Feldman
US Environmental Protection Agency Region
VI, 6H-CS
First Interstate Bank Tower
1445 Ross Avenue
Dallas, TX 75202-2733

Mr Tim Murphy
US Department of the Interior
Bureau of Land Management
1800 Marquess
Las Cruces, NM 88005

Mr Mark Blakeslee
US Department of the Interior
Bureau of Land Management
PO Box 27115
Santa Fe, NM 87502

Mr Ron Stirling
US Army Corps of Engineers
Omaha District
215 N. 17th Street
Omaha, NE 68102-4978

Mr Brent Johnson
HQ ACC/CEVC

Ms Jo Ann Hubbard
HQ ACC/CEVR

Ms Mary Orms
Fish and Wildlife Service
3530 Pan American Highway NE
Albuquerque, NM 87107

Air Force Regional Civil Engineer
(AFCEE/CCR-D))
Attn: Mr Lopez & Mr Jahns
PO Box 116
525 Griffin St.
Dallas, TX 75202

Capt Joe Miller
49 FW/JA

Mr Wallace Hise
Radian Corp
8501 Mo-Pac Blvd.
PO Box 201088
Austin, TX 78720-1088