

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

16 DEC 1992

SUBJ: Establishment of Basewide Cleanup Standards

TO: New Mexico Environment Department
Attn: David Morgan
Ground Water Protection and Remediation Bureau
1190 St. Francis Dr.
P.O. Box 26110
Santa Fe, New Mexico 87502

1. In an attempt to accelerate cleanup on Holloman, we are recommending a basewide cleanup standard for Total Petroleum Hydrocarbons (TPH) in soils. Currently, a 1000 ppm TPH cleanup standard has been established for Underground Storage Tank (UST) sites. In discussions with your office, it is our understanding that you agree that a basewide cleanup standard is the most effective means of insuring uniform remediation across the base.
2. In addition to establishing a TPH cleanup standard, we are recommending that no groundwater remediation be required on Holloman beyond the removal of free product, unless a receptor currently exists for the site. Per our 11 December telephone conversation, we understand that your office believes that this recommendation is protective of human health and the environment. Volatilization of organic chemicals from groundwater during discharge into adjacent arroyos is an example of potential receptors. In such a case, if a receptor did exist at the site, groundwater remediation would be required to remove any risk posed by the site. As you know, the water below Holloman is non-potable and therefore not used as a drinking source. Risk assessments have shown that the contaminants found in the groundwater pose no threat to human health or the environment and many of the contaminants will naturally attenuate if left in place.
3. Currently, 11 Installation Restoration Program (IRP) Sites (also identified as 17 Solid Waste Management Units), or SWMU's, are awaiting cleanup criteria before proceeding with the Feasibility Study (FS) or Remedial Design (RD) phase. The FS or RD cannot begin at these sites until cleanup standards have been established. Both Subpart S and risk-based cleanup levels are currently being used for soil remedial design parameters. However, until Holloman receives formal guidance on groundwater remediation and remediation of TPH contaminated soils at non-UST sites, these sites cannot continue into the FS or RD phase.
4. Holloman is hopeful that these issues can be resolved in the near future so that remedial activities currently on hold can be started as soon as possible. Funds currently available have a limited period of usage. In order to make the most of these funds, sufficient time is needed to evaluate remedial alternatives and design specifications.

CEV COORD: W ^(S)

CEV/Warren Neff/3931/pm/15 Dec 92/#1995V

5. If you have any questions regarding these issues or require additional information, please contact Warren Neff or Roger Wilkson at 479-3931.

SIGNED

HOWARD E. MOFFITT
Deputy Base Civil Engineer