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GOVERNOR

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State of New Mexico  
ENVIRONMENT DEPARTMENT  
Harold Runnels Building  
1190 St. Francis Drive, P.O. Box 26110  
Santa Fe, New Mexico 87502  
(505) 827-2850

JUDITH M. ESPINOSA  
SECRETARY

RON CURRY  
DEPUTY SECRETARY

January 25, 1993

Mr. Howard E. Moffitt  
Deputy Base Civil Engineer  
49 CES/CEV  
550 Tabosa Ave.  
Holloman Air Force Base, NM 88330-8458

Dear Mr. Moffitt:

I have taken this opportunity to respond to your letter of December 16 to David Morgan in regard to soil and ground water remediation standards acceptable to the Environment Department at Holloman Air Force Base.

A basewide soil cleanup standard of 1000 parts per million of total petroleum hydrocarbons (TPH), measured as agreed for UST sites in the letter of November 2, 1992 to you from James P. Bearzi, will be acceptable to NMED at all sites involving release of petroleum hydrocarbons - provided there are no RCRA hazardous constituents present for which risk-based cleanup levels would be more stringent. For instance, levels of benzene in soil under proposed Subpart S corrective action guidance may not exceed 25 parts per million. As a practical matter, it is very unlikely that any constituent associated with petroleum hydrocarbons would be present in unacceptable concentrations at a site where no soil contained more than 1000 ppm TPH. However, enough confirmatory analyses must be performed at each site to ensure that this is the case.

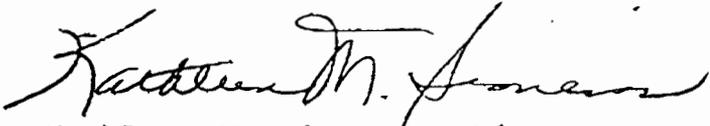
Remediation of existing ground water contamination will not be required by NMED at Holloman Air Force Base, unless a situation is present where a human or ecological receptor is exposed to unacceptable risk from contact with the contaminated water. We agree that direct ingestion of the water by humans is not a plausible exposure scenario. However, additional ground water contamination will not be acceptable. To implement this principle, existing contaminant plumes must be adequately characterized and monitor wells in those plumes must be sampled at least annually for the contaminants present. If contaminants at any point in a plume increase in concentration, or if additional contaminants are discovered, further investigation may be required to locate and remove the source.

RON CURRY

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The Environment Department will, however, insist on remediation of any ground water contamination resulting from current or future activities at Holloman Air Force Base.

Sincerely,



Kathleen M. Sisneros, Director  
Water and Waste Management Division

c: Benito J. Garcia, Chief, HRMB  
Steven J. Cary, Chief, GWPRB  
Rich Mayer, EPA Region 6



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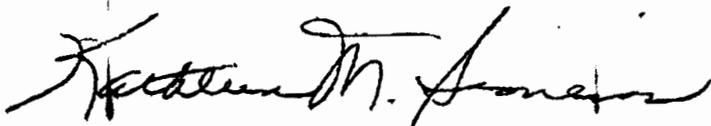
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