

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Howard E. Moffitt
Deputy Base Engineer
Environmental Management
550 Tabosa Avenue
Holloman Air Force Base, New Mexico

Dear Mr. Moffitt:

The Environmental Protection Agency (EPA), in conjunction with the New Mexico Environment Department (NMED), have completed a technical review of the Holloman Air Force Base (HAFB) Table 2 SWMU's RFI Workplan, dated March 26, 1993 and have determined that the Workplan is deficient. A list of deficiencies is enclosed for your review.

A revised Workplan which addresses the enclosed deficiencies is due to EPA and NMED by May 12, 1993. If this revised Workplan is not approved, EPA, in conjunction with the NMED, may make further modifications as required. The modified Workplan then becomes the approved RFI Workplan. If any further clarifications are needed concerning the enclosed comments, the Region recommends that HAFB schedule a meeting.

If you have any questions concerning this letter, please contact Richard Mayer of my staff at (214) 655-7442.

Sincerely yours,

Guanita Reiter, Acting Chief
RCRA Permits Branch (6H-P)

Enclosure

cc: Benito Garcia, NMED
Dave Morgan, NMED

6H-Pn:MAYER:RM:5-7442:3/16/93:A:holtbl2:PromoDISK:NM....422
Technical File

6H-Pn
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OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

of pages = 10

To: <i>Stephanie Stoddard</i>	From: <i>Rich Mayer</i>
Dept./Agency: <i>NMED</i>	Phone #: <i>214-655-2442</i>
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NEN 7540-01-217-7288 5099-101 GENERAL SERVICES ADMINISTRATION

**Deficiency Comments on Holloman AFB
Table 2 SWMU's RFI Workplan**

SWMU's 119 and 2

Page 4-2, SWMU Description and History: Please explain by what means is this waste oil from the oil/water separator (o/ws) transferred to the adjacent waste oil tank. Also, please indicate whether the waste from the building has always gone to the existing separator and tank or did it go to another location/separator. In addition, please include in the workplan a section on how the halon vapor monitoring system works.

Page 4-2; Evaluation of Existing Data: Please indicate whether past records has shown that the ow/s (and its associated piping) has overflowed or leaked.

Page 4-3; Objectives, 2nd Paragraph: EPA is not sure what is meant by the first two sentences. However, if contamination is found, the full extent of contamination must be determined, in addition to any requirements by the NM UST regulations.

Page 4-3; Integrity Testing: How long a time will the water be measured? In addition, how will the associated piping be tested. Also, please justify how integrity testing ensures that the o/ws will (in the future) not overflow from the top and contaminate the soil.

Page 4-4; Soil Sampling: If the unit does not fail integrity testing, will Holloman include the integrity testing results in the RFI Report? In addition, since past testing of the waste oil tank shows that it has leaked and there has been a past fuel spill, soil borings will be mandatory for this unit. Also, EPA believes that an additional borehole is needed for the tank and the o/ws and that an additional interval is needed at the 3-4 foot interval below the bottom of the units. Furthermore, Holloman should sample intervals that are visually contaminated and analyze these samples for semivolatiles.

SWMU's 15 & 120

Page 4-7, SWMU Description and History: Please explain by what means is this waste oil from the oil/water separator (o/ws) transferred to the adjacent waste oil tank. Also, please indicate whether the waste from the building has always gone to the existing separator and tank or did it go to another location/separator. Also, please clarify the statement "There have been no records of releases occurring at the site". Is this meant to verify that no releases have occurred or that no records of releases were found?

Page 4-8; Objectives, 2nd Paragraph: If contamination is found, the full extent of contamination must be determined, in addition to any requirements by the NM UST regulations.

Page 4-3; Integrity Testing: How long a time will the water be measured. In addition, how will the associated piping be tested. Please justify how integrity testing ensures that the o/ws has (in the past) and will (in the future) not overflow from the top and contaminate the soil.

Page 4-9; Soil Sampling: If the unit does not fail integrity testing, will Holloman include the integrity testing results in the RFI Report? Also, EPA believes that an additional borehole is needed for the tank and the o/ws and that an additional interval is needed at the 3-4 foot below the bottom of units. Furthermore, Holloman should sample intervals that are visually contaminated and analyze these samples for semivolatiles.

SWMU's 121 & 17

Page 4-12; SWMU Description: Please include the full results of the vapor monitoring system around the tank. Please explain by what means is this waste oil from the oil/water separator (o/ws) transferred to the adjacent waste oil tank. Also, please indicate whether the waste from the building has always gone to the existing separator and tank or did it go to another location/separator. Also, please clarify the statement "There have been no records of releases occurring at the site". Is this meant to verify that no releases have occurred or that no records of releases were found?

Page 4-13; Integrity Testing: How long a time will the water be measured. Please justify how integrity testing ensures that the o/ws has (in the past) and will (in the future) not overflow from the top and contaminate the soil.

Page 4-14; Soil Sampling: If the unit does not fail integrity testing, will Holloman include the integrity testing results in the RFI Report? Also, EPA believes that additional borehole is needed for the tank and the o/ws and that an additional interval is needed at the 3-4 foot interval below the bottom of the units. Furthermore, Holloman should sample intervals that are visually contaminated and analyze these samples, including semivolatiles.

SWMU's 123 & 22

Page 4-16; SWMU Description: Please explain by what means is this waste oil from the oil/water separator (o/ws) transferred to the adjacent waste oil tank. Also, please indicate whether the waste from the building has always gone to the existing separator and tank or did it go to another location/separator. Also, please clarify the statement "There have been no records of releases occurring at the site". Is this meant to verify that no releases have occurred or that no records of releases were found?

Page 4-17; Objectives, 2nd Paragraph: If contamination is found, the full extent of contamination must be determined, in addition to any requirements by the NM UST regulations.

Page 4-17; Integrity Testing: How long a time will the water be measured. In addition, how will the associated piping be tested. Please justify how integrity testing ensures that the o/ws has (in the past) and will (in the future) not overflow from the top and contaminate the soil.

Page 4-17; Soil Sampling: If the unit does not fail integrity testing, will Holloman include the integrity testing results in the RFI Report? Also, EPA believes that additional borehole is needed for the tank and the o/sw and that an additional interval is needed at the 3-4 foot interval below the bottom of the units. Furthermore, Holloman should sample intervals that are visually contaminated and analyze these samples, including semivolatiles.

SWMU's 126 & 36

Page 4-20; SWMU Description: Please explain by what means is this waste oil from the oil/water separator (o/ws) transferred to the adjacent waste oil tank. Also, please indicate whether the waste from the building has always gone to the existing separator and tank or did it go to another location/separator. Also, please clarify the statement "There have been no records of releases occurring at the site". Is this meant to verify that no releases have occurred or that no records of releases were found?

Page 4-21; Integrity Testing: How long a time will the water be measured. In addition, how will the associated piping be tested. Please justify how integrity testing ensures that the o/ws has (in the past) and will (in the future) not overflow from the top and contaminate the soil.

Page 4-21; Soil Sampling: If the unit does not fail integrity testing, will Holloman include the integrity testing results in the RFI Report? Also, EPA believes that additional borehole is needed for the tank and the o/sw and that an additional interval is needed at the 3-4 foot interval below the bottom of the units. Furthermore, Holloman should sample intervals that are visually contaminated and analyze these samples, including semivolatiles.

Page 4-23; O/WS Sampling: The o/ws and waste oil tank should be sampled and analyzed separately. Please revise the workplan.

SWMU's 125 & 32

Page 4-25; SWMU Description: How are liquids directed to the Fire Water Tank and then to the o/ws? Please explain by what means is this waste oil from the oil/water separator (o/ws) transferred to the adjacent Fire Water Tank. Also, please indicate whether the waste from the building has always gone to the existing separator and tank or did it go to another location/separator.

Page 4-26; Integrity Testing: How long a time will the water be measured. In addition, how will the associated piping be tested. Please justify how integrity testing ensures that the o/ws has (in

the past) and will (in the future) not overflow from the top and contaminate the soil.

Page 4-26; Soil Sampling: If the unit does not fail integrity testing, will Holloman include the integrity testing results in the RFI Report? Also, EPA believes that additional borehole is needed for the tank and the o/sw and that an additional interval is needed at the 3-4 foot interval below the bottom of the units. Furthermore, Holloman should sample intervals that are visually contaminated and analyze these samples, including semivolatiles.

Page 4-28; Tank and O/WS Sampling: The o/ws and the Fire Water Tank contents should be sampled and analyzed separately.

SWMU's 39, 127, & 135

Page 4-29; SWMU Description: Please explain by what means is this waste oil from the oil/water separator (o/ws) transferred to the adjacent waste oil tank and the drainage pit.

Page 4-30; Sampling and Analytical Plan: EPA feels that a backhoe trench across the pit area might give a better indication of contamination from the unit.

Page 4-30; Sampling Plan: If contamination is found, the full extent of contamination must be determined, in addition to any requirements by the NM UST regulations. Also, EPA believes that additional borehole is needed for the tank and the o/sw. Furthermore, Holloman should sample intervals that are visually contaminated and additionally analyze these samples for semivolatiles.

SWMU's 40, 128, & 138

Page 4-33; SWMU Description: Please explain by what means is this waste oil from the oil/water separator (o/ws) transferred to the adjacent waste oil tank and the drainage pit.

Page 4-34; Objectives, 2nd Paragraph: If contamination is found, the full extent of contamination must be determined, in addition to any requirements by the NM UST regulations.

Page 4-34; Sampling and Analytical Plan: EPA feels that a backhoe trench across the pit area might give a better indication of contamination from the unit. Even if Holloman feels that the trenching is not feasible, 1 soil boring should be taken where the outfall effluent hit the ground and another sample taken inside the pit. If contamination found is during removal, the full extent of contamination must be determined, in addition to any requirements by the NM UST regulations.

Page 4-36; Sampling Plan: If samples past the 0-2' show visual contamination, they should also be sampled and additionally analyzed for semivolatiles. In addition, what intervals will be

sampled in the soil borings if the HNU shows no reading at all intervals.

Page 4-37; Analytical Plan: See above comment.

SWMU 118

Page 4-40; Objectives: EPA specifically made a comment pertaining to the collection pit in a August 28, 1992, NOD letter to Holloman. EPA recommended that a soil boring be taken where the old discharge pipe is located. Please clarify whether there is a discharge pipe?

In addition, EPA recommended that Holloman delineate the full extent of (horizontal and vertical) groundwater contamination. Please revise the workplan, in the appropriate sections, to include the additional groundwater investigations for this area.

SWMU 129

Page 4-43; SWMU Description and History: Please explain how the washings (liquids) from the drainage troughs got into the underground tanks.

Page 4-47; Sampling Plan: Please clarify why there is two surficial soil samples outside the two drainage troughs western side, but no samples outside the other sides of the troughs. Also, Holloman needs to justify why only surface samples are being taken in the drainage trough, liquids may have gone through the bottoms of the troughs. In addition, what intervals will be sampled in the soil borings if the HNU shows no reading at all intervals. HNU's will not pick up lead contamination. Furthermore, Holloman should sample intervals that are visually contaminated and additionally be analyzed for semivolatiles.

SWMU's 54 and 55

Page 4-51; Objectives: It is not apparent to EPA why a soil gas investigation was chosen. Were the drums from SWMU 54 and 55 stored as far away as 75 feet at times from the main SWMU? If not, it would seem more prudent to use soil borings around the SWMU's. Please clarify.

Page 4-52; Soil Sampling: Holloman should sample intervals that are visually contaminated and additionally be analyzed for semivolatiles. In addition, what intervals will be sampled in the soil borings if the HNU shows no reading at all intervals. HNU's will not pick up lead contamination.

SWMU 56

Page 4-54; Sampling and Analytical Plan: EPA would like to see one more boring near the stained area next to paved area.

Page 4-54; Soil Sampling; Holloman should sample intervals that are

visually contaminated and analyze the samples for semivolatiles.

SWMU 63

Page 4-58; Soil Sampling: Holloman should sample intervals that are visually contaminated. Does SW8240 cover all the constituents that would be in paint thinners and paints?

SWMU 71

Page 4-62; Sampling and Analytical Plan: Why are the boreholes not drilled closer to the unit, such as 2 feet away? EPA believes that the perimeter boreholes should go to 5 feet. What intervals will be sampled in the soil borings if the HNU shows no reading at all intervals. Holloman should also sample intervals that are visually contaminated. In addition, why are metals not being analyzed for when they will be analyzed for at SWMU 63, which also handled paint and paint thinners?

SWMU 78

Page 6-66; Soil Sampling: Holloman should also sample intervals that are visually contaminated and analyze the samples for semivolatiles.

SWMU 75

Cannon needs to initiate a Class 3 permit to remove the SWMU from the RFI.

SWMU 91

Page 4-72; Soil Sampling: Justify why the two proposed samples are not centered to the runoff area? EPA feels that the borings should go to five feet. Holloman should also sample intervals that are visually contaminated and analyzed the samples for semivolatiles.

SWMU 136

Page 4-75; Sampling and Analytical Plan: If the washrack slopes to the south, why is one soil boring taken on the North? EPA feels that both borings should be located in the drainage pit, unless Holloman can justify otherwise. What intervals will be sampled in the soil borings if the HNU shows no reading at all intervals? Holloman should also sample intervals that are visually contaminated and analyze these samples for semivolatiles.

SWMU 141

Page 4-79; Objectives: This SWMU is in the permit to be investigated, Holloman must investigate this SWMU or give an acceptable justification why this SWMU should not be investigated, otherwise, Holloman will be in violation of the permit.