HAFB Rec 93

RADIAN CORPORATION

File Letter Send Reports & Documents Sections to Kathleen Sanders for Hazardous Waste

(Mailing Address)
P.O. Box 201088
Austin, TX 78720-1088
(Shipping Address)
8501 North Mopac Blvd.
Austin, TX 78759
(512) 454-4797

25 May 1993

6/15/93
Lowell Seaton, VI has been assigned HAFB in place of Rick Mayer.
SMA

Ms. Judith Espinosa, Secretary
New Mexico Environment Department
Harold Runnels Bldg.
1190 St. Francis Dr.
Santa Fe, NM 87502

VI

RE: **28 Sites Phase I RFI Work Plan, Holloman AFB, NM**
Submittal of Final Work Plan

Dear Ms. Espinosa:

Enclosed are two bound copies and one electronic copy of the two volume final 28 Sites Phase I RFI Work Plan for the above referenced project. The Work Plan provides the details associated with the proposed investigations as well as the Quality Assurance Project Plan (QAPP) and the Community Relations Plan (CRP).

If you have any questions, please contact Mr. Warren Neff, (HAFB, NM) at (505) 479-3931.

Sincerely,

Michael W. Holder
Project Director

MWH:rlm

cc: Ron Stirling--USACE, Omaha
Roger Wilkson--Holloman AFB
Wally Hise--Radian/3

M E M O R A N D U M

TO: Richard Mayer--U.S. Environmental Protection Agency, Region VI

FROM: Michael W. Holder--Radian Corporation

CC: Ms. Judith Espinosa--Secretary, New Mexico Environment Department

DATE: 25 May 1993

SUBJECT: **Response to Agency Comments on the Holloman Air Force Base, NM, 28 Site Phase I RFI Work Plan**

Holloman Air Force Base (HAFB) received comments on the 28 Site Phase I RFI Work Plan from the U.S. Environmental Protection Agency (EPA) on 16 April 1993. The New Mexico Environmental Department (NMED) also provided comments on the Work Plan to the EPA, which were incorporated into the correspondence received by HAFB. The revised Phase I RFI Work Plan submitted with this memorandum incorporates responses to the Agency's comments as well as the conclusions of several telephone conversations and one meeting between HAFB personnel and you. A brief summary of the information included in the revised Work Plan is provided below.

Waste Oil Tanks and Oil/Water Separators

- A schematic of the tank and oil/water separator systems is provided along with information describing their operation.
- Information concerning the historical disposal of wastes from buildings associated with these units is provided.
- A description of the operation of the halon vapor monitoring system installed around three of the tanks is included in Section 4.0 of the Work Plan. Historical vapor monitoring results for these tanks are included in Section 4.
- Information regarding the past operation of oil/water separators and their associated piping and evidence (none found) of possible past overflows is provided.

- As we discussed, no tanks will be removed during the Phase I RFI due to budgetary constraints, conflicts with the New Mexico Underground Storage Tank (UST) regulations, and future use now planned for these units.

- Detailed descriptions of the integrity testing procedures for the tanks, the oil/water separators, and their associated piping are provided in Section 3.2.4 of the RFI Work Plan. As discussed, integrity testing will not ensure that oil/water separators will not overflow in the future or have not overflowed in the past. Integrity testing is being performed to determine if releases have occurred from the sides and floors of the tanks and oil/water separators and from the walls and joints of the associated piping. Future overflows of the separators will be prevented in the same manner as they have been prevented in the past: through routine inspection and maintenance procedures.

- The results of all integrity tests performed will be included in the Phase I RFI report.

Sampling Activities

- Additional boreholes are included for all tanks and oil/water separators, and the interval between 3 and 4 ft below the bottom of the units has been added to the required sampling depths for each solid waste management unit (SWMU).

- Visually contaminated intervals between the ground surface and the bottom of tanks and separators will be sampled. At non-tank/separator SWMUs, visually contaminated intervals will be sampled where the highest degree of contamination is visible. All visually contaminated samples will be analyzed for semivolatile organic compounds (SW8270) in addition to the analyses already scoped for individual SWMUs.

- A review of past analytical results for samples collected from oil/water separators at HAFB is included in the Work Plan. Additional sampling and analysis of tank and separator contents during the Phase I RFI is based on the results of the historical sampling. Tank and separator contents will be analyzed separately.

- The results of five past sampling programs at the sewage lagoons were reviewed and summarized. This information is presented in Section 4.22.2

of the Work Plan along with an analyte list for the sampling of SWMUs 155 and 156. The analyte list consists of those compounds routinely detected during the past investigations as well as the routine analytical parameters for the RFI listed in Table 3-3 of the Work Plan. As we discussed, the wastewater recirculation line (SWMU 184) will not be investigated during the Phase I RFI. Investigation of this SWMU will occur during closure of the sewage lagoons in the next 2 to 3 years.

- A trench has been scoped for investigations at SWMU 135 in place of the hand-auger borings.

- Since it is not feasible to perform trenching at SWMU 138, hand-auger borings have been scoped for the interior of the pit.

- The Work Plan scope for SWMU 118 also includes investigation of SWMU 132 and Area of Concern-A (AOC-A). These plans are contained in the Phase I RFI Work Plan and were also submitted under separate cover by HAFB.

- The investigations at SWMU 129 have been adjusted to meet the requirements of EPA comments. This section also includes information on the Phase II RFI plans for SWMU 178 and the surrounding area. These plans were also submitted under separate cover by HAFB.

- The soil gas survey at SWMUs 54 and 55 has been replaced with two soil borings at each SWMU.

- As discussed, the boring nearest the stained soils at SWMU 56 was moved to within the stained area.

- Analysis for volatile organic compounds (SW8240) has been added for SWMU 63.

- Analysis for metals has been included at SWMU 71. In addition, the borings have been moved to within 2 ft of the pads.

- The sampling locations at SWMU 91 have been centered and will be drilled to 6 ft below the ground surface. This SWMU discharges to an oil/water separator.

- The northern boring has been moved south of the pad in the drainage ditch adjacent to SWMU 136. A drainage pit does not exist for this unit.

- The investigations conducted at SWMU 141 as part of the Preliminary Assessment/Site Investigation (PA/SI) in February/March 1993 are included in Section 4.19.2 of the Work Plan.

- The investigations at SWMU 164 have been revised to address EPA's comments.

- A soil sample is scoped for the investigation at SWMU 124.

- The sampling plan for SWMU 155 has been revised to include trenching in order to determine if vertical migration has occurred.

- A schematic of the piping associated with SWMU 156 is provided in the Work Plan. Boring locations have been added (and adjusted) to facilitate the detection of past releases. However, as can be seen by the piping, waste materials were allowed to freely move between the tanks in the system. Since all wastes originated from the same sources, were evenly mixed, and received the same treatment regardless of the tank they resided in; the distribution and composition of wastes (if still present) will be uniform. Therefore, HAFB believes composting of materials collected from individual tanks is justified.

- The sampling plan for SWMUs 165/177/179/181 has also been submitted under separate cover to the Agency by HAFB. The term "washrack" was in error and has been deleted from the Phase I RFI Work Plan. The sentence should have read "drainage troughs." The troughs are separate from the drainage trenches, which are natural, topographic drainage features. The troughs ended in sumps, some of which were adjacent to the natural drainage trenches. The HydroPunch survey is being conducted to delineate the extent of groundwater contamination. No wells are planned as part of the Phase II RFI investigations. Once the extent of contamination is determined, wells (if necessary) could be installed as part of the final remedy if long-term monitoring is required.

- Additional information from previous investigations is included for SWMU 101. Other documentation of investigations at this site is also referenced and will be submitted to EPA upon request.

- Additional sampling (vertical) will be performed at AOC-A. The identification of drainage contributors is also provided.

Base Sewer System

- Section 3.2.5 of the Work Plan provides detailed information on investigation procedures for SWMU 183. As discussed, smoke testing will be performed, followed by TV'ing of suspect portions of the sewer lines. No sampling will occur for the SWMU until the above procedures have been completed and a sampling and analytical plan can be developed.

Scheduling

- The schedule has been altered to reflect initiation of field activities within 3 months of Work Plan approval and the submittal of the RFI report within 15 months of Work Plan approval.

The above items are addressed in detail in the Work Plan. If you have any questions, please contact Warren Neff (HAFB) at (505) 479-3931.