



DEPARTMENT OF THE AIR FORCE

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

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

26 JUL 1993

SUBJ: Hazardous Waste Permit (Hazardous and Solid Waste
Amendments, 1984), Permit Number NM 6572124422

TO: Ms Guanita Reiter
Acting Chief
U.S. EPA, Region VI
1445 Ross Avenue
Dallas, Texas 75202

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1. Holloman Air Force Base (HAFB) is requesting several modifications to the above referenced permit, to include Class 1 and 3 modifications. This submittal includes a description of the requested modifications, supporting documentation, a proposed schedule for agency and public review, and suggested revisions to the permit to implement the requested modifications; Attachment 1 summarizes these requested modifications. A description of each requested modification is discussed in the following paragraphs. *SWMU's!*

2. HAFB is requesting revisions to Tables 1, 2, and 3 (Solid Waste Management Units (SWMUs) identified at the base) of the permit (Atch 2). These revisions are requested so the Resource Conservation and Recovery Act (RCRA) Facility Investigations (RFIs) that have been conducted in the past, and will be conducted in the future, will be consistent with the tables and investigations as referenced in the permit. The specific changes are outlined below and are considered to be administrative in nature.

a. Change the designation of "SWMU 229" to "SWMU 197" on Table 1. In the RCRA Facility Assessment (RFA) report (A.T. Kearney, Inc., 1988), the Former Entomology Shop was identified as SWMU 197; however, in the permit issued in August 1991, the Former Entomology Shop was identified as SWMU 229. All subsequent investigations and reports for the Former Entomology Shop have used the original designation of SWMU 197. HAFB requests the identification be corrected to be consistent with past documents.

b. Delete the second reference to "SWMU 102" on Table 1. SWMU 102, the Acid Trailer Burial Site, is listed twice in Table 1 of the permit.

c. Move the following SWMUs from Table 3 to Table 2 of the permit:

SWMU 2	Bldg	121	Oil/Water Separator (O/WS)
SWMU 15	Bldg	309	O/WS
SWMU 17	Bldg	316	O/WS
SWMU 22	Bldg	704	O/WS
SWMU 32	Bldg	868	O/WS
SWMU 36	Bldg	1000	O/WS
SWMU 39	Bldg	1092	O/WS
SWMU 40	Bldg	1166	O/WS

These SWMUs are included in the Table 2 RFI Work Plan submitted to the EPA in March 1993 because of their proximity to the associated waste oil tanks listed on Table 2. The inclusion of these SWMUs in this RFI Work Plan was previously discussed with the U.S. EPA, Region VI. HAFB requests that these SWMUs be moved to Table 2 for convenience in associating the Table 2 RFI Work Plan with the table in the permit.

d. Separate SWMU 113 into two SWMUs: 113A and 113B. This SWMU, the Sludge Disposal Trenches, consists of two trenches that are located in separate areas on the base. HAFB requests the designation for the SWMU be changed to:

SWMU 113A--Sludge Disposal Trenches at Lagoons
SWMU 113B--Sludge Disposal Trenches near Fire Training Area

This change is required so each site can be handled separately during the remediation and administrative process.

3. In accordance with Section IV.F of the permit, HAFB is hereby notifying the EPA of a newly-identified SWMU, the Incinerator/Landfill Site and also an Area Of Concern (AOC), the Officer's Club. HAFB proposes to add these sites to Table 3 of the permit and offers the following rationale:.

a. Incinerator/Landfill: This site is currently being investigated under the base's Installation Restoration Program (IRP) and is identified as IRP Site 58. Attachment 3, *Project Plans: Investigation of Four Waste Sites* (Radian, March 1993), provides the information required in Section IV.F.1 of the permit. HAFB is submitting these work plans to the U.S. EPA, Region VI, for their records. All sampling and analytical results from this investigation have been completed and will be submitted to the U.S. EPA, Region VI, by 30 September 1993 along with any conclusions as to whether releases of hazardous wastes or constituents have occurred, are occurring, or are likely to occur, and recommendations for further investigation or no further action.

b. Officer's Club: This site is not a SWMU, but is considered to be an AOC. It is currently being investigated under the IRP as Site 57. Attachment 4, *Sampling and Quality Control Summary Report (SQCSR): Officer's Club Soil Investigation* (Radian, April 1993), describes the history of the site and the results of a recent investigation. HAFB hereby requests a determination from the U.S. EPA, Region VI, as to whether this area should be included as an AOC in the permit.

4. HAFB requests the RFI/CMS process be terminated for the following facilities:

a. SWMU 75: HAFB is requesting that the Defense Reutilization and Marketing Office (DRMO) Hazardous Waste Storage Area, SWMU 75, be removed from Table 2. The facility is currently permitted as a regulated unit under the base's RCRA Part B permit as a container storage area. The storage area is divided into 18 compartments and is approximately 5000 square feet with a 1200 square foot staging area. The area, underlain by a steel-reinforced concrete pad with 6" concrete curbing, is well maintained. Drums are stored on pallets or shelving in the compartments comprising the unit.

The design capacity of the unit is 28,160 gallons or 512 containers (55-gallon drums). Wastes managed in this unit include the following U.S. EPA hazardous waste designations: D001, D002, D007, D008, F001, F002, F003, F005, F007, F008, F017, U002, U003, U012, U019, U022, U036, U044, U089, U154, U159, U167, U188, U220, U226, U228, U239, P012, P035, and P106. The wastes are generated and accumulated in various designated areas around the base and transported to the unit. In the past, small oil spills have been reported but no releases have occurred at this facility.

The DRMO Hazardous Waste Storage Area (SWMU 75) is an active, permitted unit with an approved closure plan; therefore, HAFB requests that the RFI/CMS process be terminated for this facility.

b. "No Further Action" SWMUs from the *Proposed Plans: Investigation, Study and Recommendation for 29 Waste Sites*, (Attachment 5). HAFB requests that the RFI/CMS process be terminated for the following SWMUs:

SWMU 42	Bldg 1 Waste Accumulation Area	IRP Site 9
SWMU 105	Golf Course Landfill	IRP Site 19
SWMU 107	Main Base Substation PCB Disposal Area	IRP Site 11
SWMU 108	MOBSS (now BBSG) Landfill Disposal Trench	IRP Site 23
SWMU 115	West Area Landfill #1 PCB Disposal Area	IRP Site 22
SWMU 116	West Area Landfill #2	IRP Site 21
SWMU 212	Building 824 Waste Accumulation Area	IRP Site 28
SWMU 137	Building 1166 Test Track Drainfield	IRP Site 38
AOC-D	Building 882 Spills	IRP Site 26
SWMU 111	Radioactive Waste Disposal Area	IRP Site 42
SWMU 192	Coco Blockhouse Disposal Well	IRP Site 41
AOC-G	Atlas Substation PCB Spill	IRP Site 43
AOC-L	Early Missile Test Site	IRP Site 37

HAFB investigated these SWMUs under the base's IRP, as part of the Investigation, Study and Recommendation for 29 Waste Sites. U.S. EPA, Region VI has reviewed the Remedial Investigation (RI) Report: Investigation, Study and Recommendation for 29 Waste Sites (Radian, October 1992) and the Risk Assessment for the Remedial Investigation: Investigation, Study and Recommendation for 29 Waste Sites (Radian, June 1992) and concurred with the "No Further Action" decision for these sites. Attachment 5, Proposed Plans: Investigation, Study and Recommendation for 29 Waste Sites (Radian, May 1993), summarizes the results of the investigations and studies performed. It also provides the justification for the "No Further Action" decision for these SWMUs. Proposed plans are a requirement of the IRP, which follows Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) guidance. The corresponding IRP site names are provided above for ease of reference.

c. Other "No Further Action" SWMUs: HAFB is requesting the RFI/CMS process be terminated for the following SWMUs:

SWMU 106	Main Base Landfill	IPR Site 1
SWMU 109	Old Main Base Landfill	IRP Site 10
SWMU 130	Taxiway 4 Tank 28	IRP Site 46
AOC-P	Building 301 Fuel Tanks Leaks	IRP Site 44
SWMU 166	MOBSS (now BBSG) Drainage Lagoon	IRP Site 25

Holloman AFB investigated these SWMUs between 1983 and 1989. The U.S. EPA, Region VI, has reviewed the Environmental Protection Agency: Interim Guidance for Hazardous Substances Removal - The Comprehensive Environmental Restoration, Compensation and Liability Act (U.S. EPA, July 1981), the Installation Restoration Program Records Search (CH₂M Hill, August 1983), the Informative Technical Report, Investigation of Polynuclear Aromatic Hydrocarbons in Area of Natural Gas Leaks (Dames & Moore, May 1985), the Installation Restoration Program: Phase II Confirmation Quantification, Stage I (Dames & Moore, May 1986/November 1986/ March 1987 - three documents), the Installation Restoration Program: Remedial Investigation - A-E Control Plan and Sampling Plan for Sites 1, 17, 31, 50, 51, 53, 54, and 55 (Walk, Haydel & Associates, Inc, January 1988), the Installation Restoration Program: Site, Health and Emergency Response Plan for 1, 17, 31, 50, 51, 53, and 55 (Walk, Haydel & Associates, Inc, January 1988), the Stage I Drilling & Sampling Technical Report, Phase II: Sites 1, 17, 31, 50, 51, 53, 54, and 55 (Walk, Haydel & Associates, Inc, June 1988), the RCRA Facility Assessment: Preliminary Review/ Visual Site Inspection Report (A.T. Kearney, Inc, September 1988), the Addendum 1: A-E Quality Control and Sampling Plan, Phase II: Stage II (Walk, Haydel & Associates, Inc, October 1988/December 1988 - two documents), the Addendum II: A-E Quality Control and Sampling Plan, Phase II: Stage II Activities (Walk, Haydel & Associates, Inc, December 1988), and the Stage I Drilling and Sampling Technical Report, Addendum I (Walk, Haydel & Associates, Inc, January 1989) and has found that these investigations are complete. Attached (enclosed) with this submittal are Site LF-01, Main

Base Landfill Decision Document, Site LF-10, Old Main Base Landfill Decision Document, Site SD-25, MOBSS Drainage Lagoon Decision Document, Site 44, Bldg 301 Fuel Tank Leaks Decision Document, and Site SS-46, Taxiway 4 Tank 28 Decision Document, (Attachments 6 - 10, respectively), which summarize the results of the investigations and studies performed at these SWMUs. Decision Documents are a requirement of the IRP, which follows CERCLA guidance. The corresponding IRP site names are provided in paragraph 4c for ease of reference.

5. As presented in the *Proposed Plans: Investigation, Study and Recommendation for 29 Waste Sites*, HAFB is making all information available to the public during a public review and comment period. HAFB will incorporate comments from the U.S. EPA, Region VI, and the public into final decision documents.

6. Attachment 11 of this letter provides a summary of the proposed schedule for the review of this modification request. The schedule reflects the requirements of 40 CFR Sections 270.42(a) and (c). Attachment 12 is a copy of the Public Notice, as published.

7. In order to document the status of each SWMU, HAFB requests a "Status" column be added to Tables 1, 2, and 3 of the permit. Attachment 2 to this letter provides the revised Tables 1, 2, and 3. The modifications requested in this letter are noted in the attachment.

8. If you have any questions regarding this modification request, please contact Mr Warren Neff at (505) 475-3931.


HOWARD E. MOFFITT
Deputy Base Civil Engineer

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1. Summary of Modification Request
2. Revised HSWA Permit Tables
3. Project Plans: Investigation of Four Waste Sites
4. SGCSR: Officer's Club Soil Investigation
5. Proposed Plans: Investigation, Study and Recommendation for 29 Waste Sites
6. Site LF-01, Main Base Landfill Decision Document
7. Site LF-10, Old Main Base Landfill Decision Document
8. Site SD-25, MOBSS Drainage Lagoon Decision Document
9. Site SS-44, Bldg 301 Fuel Tank Leaks Decision Document
10. Site SS-46, Taxiway 4 Tank 28 Decision Document
11. Modification Review Schedule
12. Public Notice

cc: David Morgan, NMED, w/Atchs 1-12
Lowell Seaton, U.S. EPA, Region VI w/Atchs 1,2,11,12
Rich Mayer, U.S. EPA, Region VI w/Atchs 1,2,11,12
Stephanie Stoddard, NMED, w/Atchs 1,2,11,12

Summary of Modification Requests

Description of Modification	Classification	Additional Information Provided
Item 1: Changes to Table 1, 2, and 3 of Permit		
a. Change SWMU 229 to SWMU 197 (Table 1)	1	See letter, Item 1.a
b. Delete second references to SWMU 102	1	See letter, Item 1.b
c. Move SWMUs 15, 17, 22, 32, 36, 39, 40, and 2 from Table 3 to Table 2	1	See letter, Item 1.c
Item 2: Addition of SWMUs		
a. Add a new SWMU: the Incineration Landfill to Table 3	1	See letter (Item 2.a) and <i>Project Plans: Investigation of Four Waste Sites</i> (Radian, March 1993)
b. Add a new Area of Concern (AOC): the Officer's Club to Table 3	1	See letter (Item 2.b) and <i>Sampling and Quality Control Summary Report: Officer's Club Soil Investigation (SQCSR)</i> (Radian, April 1993)
Item 3: Termination of Corrective Action Process		
a. Delete SWMU 75, the DRMO Hazardous Waste Storage Area, from Table 2	3	See letter, Item 3.a
b. Terminate the RFI/CMS process for the following SWMUs: 42, 105, 107, 108, 115, 116, 212, 137, AOC-D, 111, 192, AOC-G, and AOC-L	3	See letter (Item 3.b) and <i>Proposed Plans: Investigation, Study and Recommendation for 29 Waste Sites</i> (Radian, April 1993)
c. Terminate the RFI/CMS process for the following SWMUs: 106, 109, 130, AOC-P, and 166	3	See letter (Item 3.c) and Decision Documents for Sites LF-01, LF-10, SD-25, SS-44, SS-46

Table 1

From Holloman AFB's HSWA Permit

SWMU #	Unit Name	IRP Site No.	Status
42	Building 1 Waste Accumulation Area	9	NFA ¹
102	Acid Trailer Disposal Site	4	IM
104	Former Army Landfill	29	RFI-II
105	Golf Course Landfill	19	CNFA ^{1,2}
106	Main Base Landfill	1	NFA
107	Main Base Substation PCB Disposal Area	11	CNFA ^{1,3}
108	MOBSS Landfill Disposal Trench	23	CNFA ^{1,2}
109	Old Main Base Landfill	10	NFA
113A	Sludge Disposal Trenches at Lagoons	20	RFI-II
113B	Sludge Disposal Trenches near Fire Training Area	30&33	RFI-II
114	TEL Disposal Site	3	RFI-II
115	West Area Landfill #1 PCB Disposal Area	22	CNFA ^{1,2}
116	West Area Landfill #2	21	CNFA ^{1,2}
170	Fire Department Training Area 1	31	RFI-II
171	Fire Department Training Area 2	31	RFI-II
178	Building 1191 Fuel Runoff Pits	36	RFI-II
212	Building 824 Waste Accumulation Area	28	NFA ¹
130	Taxiway 4 Tank 28	46	NFA
132	Building 21 Entomology Leachfield	16	RFI-II
137	Building 1166 Test Track Drainfield	38	NFA ¹
139	Lake Holloman, which includes the earthen ditch carrying discharge from Lagoon G to Lake Holloman	-SL	RFI-II
140	Lake Stinky	-SL	RFI-II
AOC-A	Building 21 Pesticide Rinsewater Spill Area	16	RFI-II
AOC-D	Building 882 Spills	26	NFA ¹
AOC-P	Building 301 Fuel Tank Leaks	44	NFA
AOC-T	POL Storage Tank Leaks	2&5	RFI-II, CMS
197 ⁴	Former Entomology Shop	14	CMS
4	Building 131 O/WS	8	RFI-II, CMS
82	Building 131 Washrack	8	RFI-II, CMS
21	Building 702 O/WS	47	RFI-II
111	Radioactive Waste Disposal Area	42	NFA ¹
122	Building 702 Waste Oil Tank	47	RFI-II
133	Building 703 Washrack Discharge Area	47	RFI-II
134	Buildings 920-924 Drainage Ditch	24	RFI-II
192	Coco Blockhouse Disposal Well	41	NFA ¹
165 ⁵	Building 1176 Pond	39	RFI-II
166 ⁵	MOBSS Drainage Lagoon	25	NFA
179 ⁵	Discharge Box	39	RFI-II
AOC-G 5	Atlas Substation PCB Spill	43	CNFA ^{1,3}
AOC-L 5	Early Missile Test Site	37	NFA ¹

ey: NFA = No Further Action
IM = Interim Measures
CNFA = Conditional No Further Action
RFI-II = RCRA Facility Investigation--Phase II
RFA = RCRA Facility Assessment

- 1 Subject to U.S.EPA, Region VI and public approval
- 2 Conditions imposed on NFA include long-term groundwater monitoring
- 3 Conditions imposed on NFA include removal of all soil with a total petroleum hydrocarbon level in excess of 1,000 mg/kg
- 4 Corrected in permit modification dated 23 July 1993
- 5 Moved from Table 2 to Table 1 (14 Feb 1992)

Table 2

From Holloman AFB's HSWA Permit

SWMU #	Unit Name	Status
118	Bldg. 21 Pesticide Holding Tank	RFI-I
119	Bldg. 121 Waste Oil Tank	RFI-I
120	Bldg. 309 Waste Oil Tank	RFI-I
121	Bldg. 316 Waste Oil Tank	RFI-I
123	Bldg. 704 Waste Oil Tank	RFI-I
124	Bldg. 752 Waste Oil Tank	RFI-I
125	Bldg. 868 Fire Water Tank	RFI-I
126	Bldg. 1001 Waste Oil Tank ¹	RFI-I
127	Bldg. 1092 Waste Oil Tank	RFI-I
128	Bldg. 1166 Waste Oil Tank	RFI-I
129	Bldg. 1191 Spill Tank	RFI-I
135	Bldg. 1092 Oil/Water Separator (O/WS) Drainage Pit	RFI-I
136	Bldg. 1119 Washrack Drainage Area	RFI-I
155	Sludge Drying Beds	RFI-I
156	Imhoff Tanks (5)	RFI-I
AOC-U	Lost River Basin	RFI-I
164	Bldg. 1080 Pond	RFI-I
177	Bldg. 1176 Sumps	RFI-II
181	Bldg. 1176 Drainage Trough	RFI-II
183	Air Base Sewer System	RFI-I
184	Wastewater Recirculating Line	RFI-I
101	Bldg. 121 Landfill	RFI-I
54	Bldg. 702 Waste Accumulation Area (WAA)	RFI-I
55	Bldg. 702A WAA	RFI-I
56	Bldg. 807 WAA	RFI-I
63	Bldg. 867 WAA	RFI-I
71	Bldg. 1178 WAA	RFI-I
75	DRMO Hazardous Waste Storage Area	Removed
78	Trim Pad 3 WAA	RFI-I
91	Bldg. 816 Washrack	RFI-I
138 ²	Building 1166 Oil/Water Separator Drainage Pit	RFI-I
141 ²	Pad 9 Drainage Pit	RFI-I
15 ³	Bldg. 309 Oil/Water Separator (O/WS)	RFI-I
17 ³	Bldg. 316 O/WS	RFI-I
22 ³	Bldg. 704 O/WS	RFI-I
32 ³	Bldg. 868 O/WS	RFI-I
36 ³	Bldg. 1001 O/WS ¹	RFI-I
39 ³	Bldg. 1092 O/WS	RFI-I
40 ³	Bldg. 1166 O/WS	RFI-I
2 ³	Bldg. 121 O/WS	RFI-I

Key: RFI-I = RCRA Facility Investigation--Phase I
RFI-II = RCRA Facility Investigation--Phase II

- ¹ Changed from Bldg. 1000 to Bldg. 1001
² Moved from Table 1 to Table 2 (14 Feb 1992)
³ Moved from Table 3 to Table 2 (23 July 1993)

Table 3
From Holloman AFB's HSWA Permit

SWMU #	Unit Name	Status
11	Bldg. 300 O/WS	
12	Bldg. 304 O/WS	
13	Bldg. 304A O/WS	
14	Bldg. 306 O/WS	
15	Bldg. 309 O/WS	
16	Bldg. 315 O/WS	
18	Bldg. 500 O/WS	
19	Bldg. 638 O/WS	
20	Bldg. 639 O/WS	
21	Bldg. 702 O/WS	
23	Bldg. 800 O/WS	
24	Bldg. 801 O/WS	
25	Bldg. 805 O/WS	
26	Bldg. 809 O/WS	
27	Bldg. 810 O/WS	
28	Bldg. 822 O/WS	
29	Bldg. 827 O/WS	
30	Bldg. 830 O/WS	
31	Bldg. 855 O/WS	
33	Bldg. 869 O/WS	
34	Bldg. 902 O/WS	
35	Bldg. 903 O/WS	
37	Bldg. 1080 O/WS	
38	Bldg. 1080A O/WS	
41	Bldg. 1266 O/WS	
1	Bldg. 55 O/WS	
3	Bldg. 130 O/WS	
4	Bldg. 131 O/WS	
5	Bldg. 137 O/WS	
6	Bldg. 193 O/WS	
7	Bldg. 198 O/WS	
8	Bldg. 231 O/WS	
9	Bldg. 282 O/WS	
10	Bldg. 283 O/WS	
229	T-38 Test Cell Fuel Spill	
230	Bldg 828 Fuel Spill	
	Incinerator/Landfill	
	Officer's Club	

Modification Review Schedule

Activity	Date
Submit Permit Modification Request to U.S. EPA, Region VI	23 July 1993
Publish notice in local newspaper, send notice to facility mailing list recipients, place modification request and supporting documentation in information repositories	25 July 1993
60 day comment period	25 July through 22 September 1993
Public Meeting	26 August 1993
Review and address U.S. EPA, Region VI and public comments, prepare final <i>Decision Documents</i>	6 November 1993

(#0566 Published in the Alamogordo Daily News July 25, 1993)

NOTICE OF PERMIT MODIFICATION AND PUBLIC MEETING

Holloman Air Force Base (AFB) hereby gives notice of its 25 July 1993 request to the US Environmental Protection Agency (EPA) Region VI and the New Mexico Environment Department (NMED) to modify the federal Hazardous and Solid Waste Amendments (HSWA) permit. The facility's mailing address is 49 CES/CEV, 550 Tabosa Ave., Holloman AFB, NM 88330-8458.

Among the proposed modifications requested by Holloman AFB are the following: 1) Administrative changes to the titles and organization of the listing of Solid Waste Management Units (SWMUs); 2) Addition of newly identified SWMUs; and 3) Determination of no further action for 13 SWMUs.

Holloman AFB's request includes Class 1 & 3 modifications.

Interested citizens are invited to review copies of the

modification requests at the following location: Alamogordo Public Library, 10th St. & Oregon Ave., Alamogordo, NM 88310

A public meeting to answer questions about the proposed modification requests has been scheduled for 26 Aug 1993 at 7:00 PM at the Alamogordo Civic Center at 800 1st St.

Written comments will be accepted from the public for 60 days from the publication of this notice and must be postmarked by 24 September 1993. Comments should be sent to: Lowell Seaton, US Environmental Protection Agency, Region VI, 1445 Ross Avenue, Dallas, Texas 75202. Holloman AFB's designated contact is Major Schelner, (505) 475-5406.

Holloman AFB's compliance history during the life of the permit being modified is available from Lowell Seaton at the US EPA Region VI office.