



BRUCE KING
GOVERNOR

January 27, 1994

State of New Mexico
ENVIRONMENT DEPARTMENT
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DRAFT

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

Dear Mr. Moffitt:

The New Mexico Environment Department (NMED), Defense/State Memorandum of Agreement (DSMOA) staff have reviewed the Preliminary Assessment and Site Inspection (PA/SI) Report for the investigation of the four waste sites, dated November, 1993. We offer the following comments:

Site SS-12 - JP-4 Fuel Line Spill Site

- #1 A soil sample(s) should be collected and analyzed from the seemingly pervasive stratum underlying the site that is described in the report drilling logs as having a "stained grey" color and a "foul odor". This sample(s) should be collected from the most highly contaminated area. Samples should be analyzed for TPH as well as volatile and semi-volatile compounds.
- #2 Further investigation needs to be performed to evaluate the horizontal extent of both soil and ground water contamination at this site before we can agree to the recommendation for closeout.
- #3 We are concerned that the report does not address two possible routes of exposure at this site: the potential for harmful vapors in houses or other structures, and the possibility of diffusion of organic contaminants into PVC drinking water lines in the vicinity. Have these scenarios been considered?
- #4 More specific information should be included in the report about the storm sewer and pipeline at this location. For instance:
 - What area is drained by the storm sewer, and could it have contained substantial contamination sources?
 - What evidence is there that the petroleum product encountered in the storm sewer trench is a result of a release from the fuel supply line?
 - The report text (p. 4-1) states that "the location of the spill could not be confirmed"; appendix C.2 includes

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notes of a conversation with Mr. Pete Carbajal who mentions two spills from the JP-4 pipeline. Why was this site selected for investigation of the pipeline leak; was Mr. Carbajal's information used in site selection; and is there a rationale for investigation of one but apparently not the other pipeline leak?

Site SD-27 - Pad 9 Washrack Area /

- #1 Further information needs to be provided to evaluate the vertical extent of soil contamination within the former pit area at this site before the NMED could agree that a potential risk to human health and the environment does not exist and the site should be recommended for closeout.
- #2 The possibility of contaminated environmental media below the drainage gallery sump has not been addressed - in particular, does the sump have a concrete bottom?
- #3 The ORNL waste acceptance criteria for radioactive soils in appendix A.4 apparently do not apply to transuranic waste; the same appendix mentions that no transuranics are expected at any of the sites. Is there documentary or other evidence for this?
- #4 Reported contaminant concentrations units should all be similar to make comparison easier. Table 5-2 reports hydrocarbon concentration in ug/g (is this a typo?) and ug/kg while the text references mg/kg.

Site OT-35 - Spent Solvent Disposal Area

- #1 The laboratory method(s) used, and hence the compounds looked for, in the organic analysis should be specified in the report.

Site LF-58 - Incinerator/Landfill

- #1 We concur with the recommendations for further work.

Sincerely,

Stephen Pullen
Environmental Specialist, DSMOA
Hazardous and Radioactive Materials Bureau

cc: Marcy Leavitt, NMED GWPRB
Lowell Seaton, EPA Region 6