



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733



*Need to  
incorporate  
Step A -*

MAR 15 1994

Mr. Howard E. Moffitt  
Deputy Base Engineer  
Environmental Management  
550 Tabosa Avenue  
Holloman Air Force Base, New Mexico 88330-8458

Subject: Approval of Project Management Plan for Table 2 RFI  
Workplan

XIII

Dear Mr. Moffitt:

The Environmental Protection Agency (EPA), Region 6 has reviewed Holloman's Project Management Plan (PMP) submitted in conjunction with the Table 2 RCRA Facility Investigation (RFI) Phase I Workplan. The PMP is hereby approved with the attached comments. The PMP should be executed as detailed in the workplan and modified in accordance with the EPA's comments regarding agency approving authority.

If you have any questions regarding this approval letter, please contact Lowell Seaton of my staff at (214) 655-8304.

Sincerely yours,

*William K. Honker*  
William K. Honker, P.E.  
Chief, RCRA Permits Branch

cc: Steve Alexander, NMED  
David Morgan, NMED

attachment

**COMMENTS ON  
PROJECT MANAGEMENT PLAN  
FOR  
HOLLOMAN AIR FORCE BASE, NEW MEXICO**

1. Section 2.3 - Roles of U.S. Environmental Protection Agency and New Mexico Environment Department

The Project Management Plan (PMP) states that the EPA, Region 6 and NMED will have joint authority for approving Holloman's RFI workplans and reports. This is incorrect. Region 6 will have sole authority for approving Holloman's RFI workplans and reports unless and until NMED is authorized for HSWA authority.

Region 6 will continue to welcome and ask NMED for their comments. However, official approval letters for Holloman's RFI must be sent by Region 6. Notice of Deficiency (NOD) letters and approval letters from EPA will incorporate any concerns received from NMED.

RFI solid waste management units (SWMUs) that are also IRP sites will receive oversight from NMED under the Defense-State Memorandum of Agreement (DSMOA). However, Holloman may not proceed with the RFI at these SWMUs (i.e. IRP sites) until approval is also received from the EPA. There may be situations where Region 6 has given NMED the "lead" on reviewing and approving an RFI workplan but this will appear transparent to Holloman. The official approval letter will still originate from Region 6.

2. Section 3.1 - Management Approach

The PMP states that the EPA, Region 6 and NMED are co-lead agencies for Holloman's RFI and Region 6 has final authority for regulatory/permit matters. This is incorrect. See comment number 1 above.

Region 6 will have authority for HSWA matters such as Holloman's RFI until NMED is authorized for HSWA. However, NMED will have ultimate authority for RCRA matters such as permit requirements and disposal of investigation derived wastes. NMED may consult with Region 6 on these RCRA matters but NMED will be the lead agency.

3. **Figure 3-1 - Holloman RFI Schedule**

Section 3.2 of the PMP states that the RFI report will be submitted to EPA in October 1994 which is correct. However, Figure 3-1 indicates that the RFI report may not be submitted until February 1, 1995. The draft Phase I RFI report should be submitted to EPA by October 1994. It is true that Region 6's review and final approval may not occur until 1995 but this review time is not part of the RFI time schedule. Region 6 is responsible for reviewing the draft RFI report.