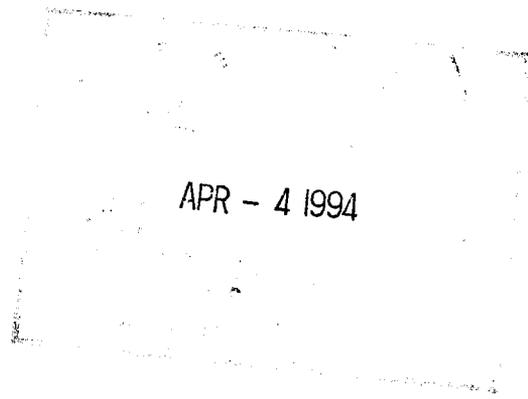


3/25/94



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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



APR - 4 1994

Mr. Benito Garcia, Chief  
Hazardous and Radioactive Waste Bureau  
New Mexico Environment Department  
P.O. Box 26110  
Santa Fe, New Mexico 87502

Re: Holloman Air Force Base, Lakes Holloman and Stinky

Dear Mr. Garcia:

This letter is intended to clarify the regulatory status of Lake Holloman and Lake Stinky at Holloman Air Force Base. There is a question as to whether the two lakes and the drainage ditch leading into Lake Holloman are subject to RCRA authority and hence are required to compile with the closure standards of RCRA and the New Mexico Environment Department (NMED). In lieu of an RCRA closure, the two lakes and drainage ditch are subject to HSWA authority and hence are required to compile with HSWA corrective action conditions with approval of the Environmental Protection Agency (EPA), Region 6.

The key point to determine if a solid waste management unit (SWMU) is a RCRA unit is whether or not the unit has ever handled hazardous wastes after May 19, 1980. As far as we can determine, Lakes Holloman and Stinky, as well as the drainage ditch leading into Lake Holloman, have never managed hazardous wastes and therefore fail the criteria for RCRA units.

Lake Holloman, Lake Stinky, and the drainage ditch are included on Table 1 of the HSWA permit (SWMUs 139 and 140) for an RCRA Facility Investigation (RFI). EPA, Region 6 has authority for the RFI and is currently reviewing the RFI report for Lakes Holloman and Stinky. Based upon the findings of the RFI, EPA will require a Corrective Measures Study (CMS) and remedial action or no further action.

EPA, Region 6 will oversee and approve any necessary remedial activities at Lake Holloman, Lake Stinky, or the drainage ditch in accordance with the HSWA permit. Region 6 will request and welcome any comments that NMED has regarding the lakes or drainage ditch as EPA proceeds with the RFI and CMS.

If you have any questions regarding this letter, please contact me at (214) 655-6785.

Sincerely yours,



David Neleigh, Chief

New Mexico/Federal Facilities Section (6H-PN)