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DATE: 06/10/94

TO: DAVID NELSON

COMPANY: EPA REGION 6, HWMD

FAX NO. 9-1-214-655-6660

TELEPHONE

Message: DAVID, BENITO GARCIA ASKED THAT YOU MIGHT REVIEW THIS "ATTACHMENT OF COMMENTS" ON A HOLLOMAN AFB CMS BEFORE WE MAIL THE FINAL TO MR. HOOKER. PLEASE CALL ME WITH YOUR COMMENTS. THANKS!

FROM: STEVE PULLEN NO OF PAGES 4 (including cover)

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Attachment
NMED/HRMB Comments
Holloman AFB (HAFB) Feasibility Study (FS) and Investigation, Study and Recommendation for 29 Waste Sites
(Sites 8 and 14, SWMUs 82 and 197, respectively)

GENERAL COMMENTS

1. The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) considers the above-referenced FS to be generally deficient for three reasons. First, HRMB believes that the "remedial" alternative recommended for both SWMUs 82 and 197, capping the wastes in-place, is inappropriate. NMED does not consider capping to be a remediation activity. Second, if source containment through capping is to be considered, HAFB should portray more accurately the costs associated with long term monitoring and appropriate institutional controls. Finally, all possible remedial alternatives are not adequately addressed because HAFB did not consider excavation and placement of remediation wastes in a Corrective Action Management Unit (CAMU). Addressing these deficiencies would allow for a more accurate comparison of all the remediation alternatives.

   The HAFB FS recommends capping as remedial alternative for both SWMUs 82 and 197. The HRMB recognizes that source containment through capping, plus institutional controls, may achieve the corrective action objectives outlined in the FS and also provide an acceptable level of health-based risk. However, HRMB considers that simply containing a contaminant source through capping is contradictory to the intent of the Hazardous and Solid Waste Amendments (HSWA). Base RCRA closure requirements for landfills, surface impoundments, etc. specify capping and ground water monitoring as the only possible remedial alternative if wastes are left in place. HSWA, however, encourages "source control technologies that involve treatment of wastes, or that otherwise do not rely on containment structures or systems to ensure against future releases."

   The HRMB is concerned that the rationale for capping wastes in place at SWMUs 82 and 197 might be applied at too many of the remaining SWMUs under investigation at HAFB. By allowing these SWMUs to be capped, a precedent might be established resulting in a patchwork of contaminated sites throughout the base. HRMB also believes this situation would unnecessarily burden the facility, the regulatory agencies and the public by requiring long-term monitoring and maintenance of the capped units.

2. The HRMB also believes that the institutional controls, contaminant monitoring proposals and the estimated costs outlined for HAFB's recommended remediation strategy are deficient. Capping potentially hazardous wastes in-place is

appropriate only under extraordinary conditions. Capping, when used, should be consistent with the post-closure care and use of property requirements outlined in 40 CFR 264.117. Although the FS recommends fencing the sites and posting of warning signs as institutional controls, HAFB also proposes continued use of these sites. HRMB encourages the Environmental Protection Agency (EPA) to disallow the continued use of the sites as stipulated in 264.117 (c), so that the integrity of the caps could be assured. HRMB also encourages EPA to require deed restrictions to protect future property users. See specific comment #3 below.

3. HAFB's HSWA Permit, Section IV, Part S, Task VI (Identification and Development of the Corrective Action Alternative or Alternatives) Subtask D, states that the permittee shall screen any (and presumably all) supplemental corrective action technologies. The HRMB believes that all possible remedial alternatives are not adequately addressed because HAFB does not consider excavation and placement of remediation wastes in a Corrective Action Management Unit (CAMU). HAFB's FS does, however, consider excavation and off-site disposal to satisfy all remedial action objectives but because of the high cost of disposal these alternatives were not considered as a viable option by HAFB.

   In the preamble to the CAMU rule, 58 FR 8658-85 (February 16, 1993), the EPA indicates that its intent is to provide an expeditious, more flexible corrective action alternative for remediation wastes. CAMUs would allow consolidation of remediation wastes, possible closure of many SWMUs and less overall monitoring of contamination. The preamble, in fact, states that the CAMU concept will result in "a lower incidence of capping waste in place without treatment". HRMB believes that HAFB's FS should at a minimum, consider this approach. NMED requests that the EPA require HAFB evaluate the feasibility of using a CAMU in their remediation strategy for the above-referenced SWMUs. EPA's authority rests in the requirements outlined in subsections 264.522 (d) of the finalized portion of the 40 CFR Subpart S Rule, and by referencing HAFB's HSWA Permit. NMED further requests that the state be a partner in the review of the CAMU as previously agreed between the NMED and EPA.

SPECIFIC COMMENTS

1. HAFB must expand its list of remedial action objectives (RAOs) to include "prevention of further ground water contamination". Section 2.1.1 of HAFB's FS, Overall Remedial Action Objectives, states that restoration of contaminated ground water is not a RAO due to the non-potable nature of water below the base. Section 2.1.2, NMED Standards, states that ground water remediation, beyond removal of any floating hydrocarbons, is not required for sites contaminated with

petroleum products (July 22, 1992 letter from Steven J. Cary, then Chief of the Ground Water Protection and Remediation Bureau, to Howard E. Moffit, HAFB Deputy Base Civil Engineer). HAFB is reminded that another NMED letter from Kathleen M. Sisneros, Director of the NMED Water and Waste Management Division, dated January 25, 1993, states that the base is prohibited from creating any additional ground water contamination and that if this happens or if contaminant concentrations increase, the base may be required to remove the source of that contamination and to restore the quality of the ground water. This letter must also be referenced in the FS. Tables 2-5 and 2-9 must be augmented to include "to prevent future contamination of ground water".

2. HAFB must detail how the "Base-wide ground water monitoring program" mentioned in section 4.1 will serve as a detection monitoring program for SWMUs 82 and 197. HAFB must also explain why the monitoring costs are not included in the costs for the recommended alternative.

3. HAFB must clarify the land use issue in their recommended remedial alternative for SWMU 82. Section 6 recommends Alternative No. 4 which calls for work to continue at the site after completion of the remedial action along with the institutional controls outlined in Alternative No. 2. Alternative No. 2 states, however, that work would not continue at the site.

4. HAFB must justify the definition of horizontal extent of soil contaminant concentration above cleanup criteria as shown in Figure 2-6. Soil boring data shows closure to the northeast and the northwest but not to the southeast or southwest. Figure 2-8 must be justified for the same reasons.

5. HAFB states in Sections 4.1.2 and 4.1.3 that ground water monitoring will be carried out as part of the Base-wide ground water monitoring program. HRMB would require site-specific, comprehensive ground water monitoring as outlined in 40 CFR 264.98 (detection monitoring programs) over a minimum post-closure period of thirty (30) years for the reasons outlined in specific comment #1 below. This might require the construction of additional monitoring wells plus considerable analytical costs that must be factored into cost calculations.