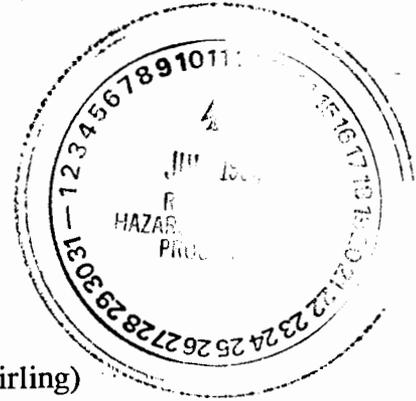




CONFIRMATION NOTICE NO. 3



TO: U.S. Army Engineer District
ATTN: CEMRO-ED-EA (Ron Stirling)
215 North 17th Street
Omaha, Nebraska 68102-4978

CC: David Dentino, HQ ACC

CONTRACTOR: Radian Corporation

CONTRACT NUMBER: DACA45-93-D-0027

DELIVERY ORDER NUMBER: USACE DO# To be determined

TITLE: Sewage Lagoons and Lakes Project
Holloman AFB, NM

DATE OF THIS REPORT: 7 July 1994

SUBJECT: 30 June 1994 Conference Call with NMED--Scheduling

PARTICIPATING PERSONNEL: Stephanie Kruse, NMED 505/827-4308
Barbara Hoditschek, NMED 505/827-4308
Mark Sites, EPA 505/827-4313
Fred Fisher, Holloman AFB 505/475-3931
Tim O'Donnell, Holloman AFB 505/475-3931
Ann Strickland, ENSERCH 505/986-6701
Kathleen Alsup, Radian 512/454-4797
Tom Holcomb, Radian 512/454-4797
Robert Michna, Radian 512/454-4797

A conference call was held on 30 June 1994 with representatives from NMED, Holloman AFB, ENSERCH, and Radian to discuss scheduling of the Holloman AFB sewage lagoons and lakes closure project. The meeting began with an overview of the past two conference calls including both resolved and unresolved issues. Specific discussions are summarized below along with action items.

Page 2

Confirmation Notice No.3

7 July 1994

1. Overview of Past Conference Calls

See bulleted items on attached agenda for resolved and unresolved issues.

2. Sludge Waste Classification

Holloman AFB submitted a letter on April 15, 1994 to NMED requesting a determination of whether or not the sludge in the lagoons and lakes is a "listed hazardous waste".

Holloman AFB believes that the sludge in the sewage lagoons and lakes is not a listed hazardous waste because there have been few detections of listed compounds, and the listed waste that was alleged to have entered the lagoons was only in small or "de minimis" quantities. During the last conference call, Steve Alexander (NMED), commented that he believed the sludge would not be classified as a listed hazardous waste, but would confirm with EPA Region VI.

Holloman AFB will resubmit the April 15, 1994 letter to NMED for review. After reviewing the letter, NMED will discuss the classification of the sludge with EPA Region VI, and respond to Fred Fisher (Holloman AFB).

3. Project Schedule

The current schedule proposes to begin sampling in the Fall of 1994. Analytical results should be available during the beginning of 1995 and a report characterizing the findings could be submitted to NMED in the Summer of 1995.

NMED pointed out that sampling is typically presented in a closure plan and performed after the closure plan has been approved. NMED suggested that a closure plan be submitted up front before additional sampling.

It was pointed out that the closure of the sewage lagoons is not a typical RCRA closure, since the primary use of the lagoons is not for the treatment, storage, or disposal of hazardous waste. Therefore, until sampling and analysis are performed it cannot be determined what areas need to be closed and how the waste should be treated or disposed of.

Since NMED indicated that it would be 1995 before they could review a closure plan, Holloman AFB would like to continue as planned with the sampling this Fall rather than wait until a closure plan can be approved.

Page 3

Confirmation Notice No.3

7 July 1994

4. Closure Plan

Stephanie Kruse noted that Los Alamos National Laboratories (LANL) was submitting a closure plan that would present what types of work efforts would be performed during a closure process including schedules, deliverables, and decision points. If Holloman AFB would submit this type of closure plan, issues could be resolved as noted in the closure plan.

Stephanie Kruse will submit her LANL closure plan notes to Fred Fisher (Holloman AFB) and Kathleen Alsup (Radian). A closure plan will be prepared as soon as possible for NMED's review. Schedule for this submittal will be discussed in the next conference call scheduled for August 3, 1994.

5. NMED Comments on Conceptual Plan for Additional Sampling

Since, the field work is currently anticipated to begin in the Fall of 1994, Holloman AFB requested that NMED conduct an informal review of the *Conceptual Plan for Additional Sampling* by 1 August 1994. NMED could then give Holloman AFB an opinion of the proposed sampling effort. Barbara Hoditschek will discuss this schedule with Ron Kern (NMED Technical Group) during the week of July 5th and notify Fred Fisher (Holloman AFB) if this review schedule is feasible.

ACTION ITEMS

- NMED to review the January 1994 *Conceptual Plan for Additional Sampling* and respond informally to Holloman AFB during the next conference call.
- NMED to discuss the listed hazardous waste issue with Lowell Seaton (EPA Region VI).
- Stephanie Kruse to submit LANL closure plan notes to Fred Fisher (Holloman AFB) and Kathleen Alsup (Radian).
- Holloman AFB and NMED schedule an NMED site visit of the lagoons and lakes, if budget available.
- Next conference call scheduled for Wednesday, August 3, 1994 at 10:00 (Mountain).

**AGENDA FOR NMED/HOLLOMAN AFB CONFERENCE CALL
30 JUNE 1994/10:00 PM Mountain Time**

I. OVERVIEW OF PAST CONFERENCE CALLS (~ 5 minutes)

Resolved Issues:

- Lagoons covered under RCRA, Lakes and Ditch covered under HSWA
- Pond G was Determined to be a Wetland by the Army Corps of Engineers
- NMED's approved using Appendix IX constituents to demonstrate clean closure
- An addendum to the current risk assessment will be submitted after collecting, analyzing, and reviewing the data from the proposed sampling efforts

Unresolved Issues:

- NMED comments on proposed sampling plan
- Lagoon's Sludge Waste Classification probably "Not Listed Waste", but NMED will discuss with EPA, Lowell Seaton
- Does delay of closure plan need to be amended and resubmitted?
- Schedule for submitting closure plan
- Timing of HSWA authorization to NMED

II. GENERAL SCHEDULE FOR PROJECT (~ 15 minutes)

- Field work
- Reporting
- NMED comments

III. NMED REVIEW OF SAMPLING PLAN AND CLOSURE PLAN (~ 10 minutes)

- NMED comments on timing needed for review