



BRUCE KING  
GOVERNOR

State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
Harold Runnels Building  
1190 St. Francis Drive, P.O. Box 26110  
Santa Fe, New Mexico 87502  
(505) 827-2850

JUDITH M. ESPINOSA  
SECRETARY

RON CURRY  
DEPUTY SECRETARY

August 3, 1994

49 CES/CEV  
550 Tabosa Avenue  
Holloman Air Force Base  
New Mexico 88330-8458  
ATTN: Mr. Fred Fisher

Dear Mr. Fisher:

As we discussed during the conference call on June 29, 1994, enclosed is an outline detailing the internal reports and approvals to be contained in a proposed closure plan for two sewage lagoons at another facility. The proposed closure plan assumes no listed hazardous wastes in the lagoons. The facility wants to clean close these lagoons by demonstration that performance standards are met, i.e., that there is no threat to human health or the environment. A sampling and analysis plan is already contained in the plan, as well as a methodology for a risk assessment.

The closure plan will state that the New Mexico Environment Department (NMED) will approve each report described below before the facility proceeds to the next step.

I believe that a variation on this format will provide both Holloman Air Force Base and this Department with a necessary overview of, and time frame for, potential closure activities, rather than reviewing these activities as piecemeal actions. At the same time, Holloman will not be required to structure activities which may not be necessary.

Please call Stephanie Kruse of my staff at 505/827-4308 if you have any questions or comments.

Sincerely,

  
Barbara Hoditschek, Manager  
RCRA Permits Program  
Hazardous and Radioactive Materials Bureau

Enclosure

xc: Ron Kern, NMED  
Kathleen Alsup, Radian  
Red file - 94

## FORMAT FOR INCLUSION OF DECISION POINTS IN CLOSURE PLAN

I. After sampling and before commencing any implementation of closure activities, the facility will submit an intermediate report to NMED which will:

- i. identify sampling results; and
- ii. propose one of three actions (discussed in II-IV below), based on sampling results.

II. **Clean closure in place, the preferred action.**

- a. Clean closure in place will be allowed if, based on sampling results, no hazardous constituents are detected or one hazardous constituent which is below the screening action level for that constituent is detected. Screening action levels are already contained in the closure plan.

The facility will proceed to complete a final closure report.

**\* When NMED approves this final report, CLOSURE IS COMPLETE.**

- b. If more than one hazardous constituent is detected, the facility will do a very conservative risk assessment, which does not take fate or transport into account, and which considers the cumulative effects of all hazardous constituents present. The facility will prepare a final closure report for NMED approval which will also:

- i. detail the assessment of risk for the two impoundments.

**\* If there is no threat to human health or the environment, based on the risk assessment, NMED will approve clean closure in place, as in II.a. above. When NMED approves this report, CLOSURE IS COMPLETE.**

III. **Removal of "hot spots".**

If the risk assessment shows that there is some threat to human health or the environment, i.e., that some "hot spots" are present, the facility will prepare an intermediate report which will also:

- i. detail the assessment of risk for the two impoundments, including the location of the risk;

- ii. propose a sampling and analysis plan to delineate the extent of the "hot spots";
- iii. detail how contaminated soil will be removed, including storage and final disposal areas; and
- iv. propose a confirmatory sampling and analysis plan.

**\* When NMED approves this plan, the facility will implement closure.**

Upon completion of closure activities, the facility will prepare a final closure report which will also:

- i. detail removal of contaminated soil and decontamination of equipment, etc.; and
- ii. detail the results of the confirmatory sampling.

**\* When NMED approves this final closure report, CLOSURE IS COMPLETE.**

#### **IV. Closure as a landfill.**

If, based on risk assessment results, extensive contamination is apparent (not a likely scenario), the facility will prepare a closure/post-closure plan for closure as a landfill.