MEMORANDUM

TO:         The Files
FROM:       Stephanie Krue
SUBJECT:    Holloman Air Force Base: Listed Waste Issue
DATE:       August 17, 1994

1. I talked to Lowell Seaton, EPA, RCRA Permits, yesterday regarding the status of Holloman's sewage lagoons - i.e., do they contain or have they ever contained listed waste?

   His feeling is that they do not - that if any had entered the lagoon system, it was in such small amounts that it would never show up in the sampling. This was a judgment call on EPA's part.

   I told him that I would look at Holloman's justification (for not considering the sludge to be a listed hazardous waste) and data again, but that my bias was to consider the sludge a non-listed waste. I requested that, if he should develop any convictions about this matter within the next couple of weeks, he get in touch with me.

2. Today, I repeated this conversation with Barry Feldman, EPA, and made the same request. Barry had even less to say about the matter than Lowell.