



NEW MEXICO
ENVIRONMENTAL DEPARTMENT
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

1994 SEP 28 AM 10:48

SEP 23 1994

OFFICE OF THE SECRETARY

Handwritten: Benito
Doug →
Steve P. ✓

Handwritten: XIII

Mr. Howard E. Moffitt
Deputy Base Engineer
Environmental Management
550 Tabosa Avenue
Holloman Air Force Base, NM 88330-8458

Handwritten: Barbara
Ron K
Do you agree with this or find remedy?
Bonds
BH

Dear Mr. Moffitt:

The Environmental Protection Agency (EPA) Region 6 has reviewed Holloman's Draft Final Feasibility Study dated December 1993 which completed the requirements of the Corrective Measures Study (CMS). The CMS report examined corrective action alternatives for three solid waste management units (SWMUs) to determine which remedies are appropriate at the respective SWMUs. EPA hereby accepts this CMS report. Region 6 is preparing a draft permit modification to impose final remedies at the three SWMUs.

The CMS report proposed to remediate the soil contamination at SWMU No. AOC-T - POL Storage Tank Leaks (IRP Sites No. 2 & 5) by using soil vapor extraction (SVE) and bioventing. Region 6 agrees that this SWMU requires corrective action. Region 6 will prepare a statement of basis and a draft permit modification in accordance with 40 CFR 270.41 incorporating SVE as a final remedy. The draft permit modification will require public notice to request the public's comments on the proposed remedy and proposed clean up levels. If no adverse comments are received, then Region 6 will approve the permit modification to implement the SVE remedy as a final remedy.

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Holloman may not begin actual construction of the SVE facilities until the final permit modification is issued by Region 6. The EPA must follow required public participation procedures before the permit modification can be issued and Holloman can begin construction. If Holloman wishes to begin corrective actions at SWMU No. AOC-T before the final permit modification is issued, then Holloman must request in writing authorization to begin work early. Region 6 will consider the request and may grant Holloman temporary authorization to proceed with the proposed SVE remedy after the written request is received.

Region 6 is rejecting all of the corrective action alternatives that Holloman considered in the CMS report for SWMU No. 82 - Building 131 Washrack and SWMU No. 197 - Former



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Entomology Shop Area. Region 6 instead will require Holloman to construct a RCRA landfill cap over the contaminated areas at SWMUs No. 82 and 197.

Region 6 will prepare a statement of basis and a draft permit modification in accordance with 40 CFR 270.41 requiring RCRA landfill caps as final remedies. The draft permit modification will require public notice to request the public's comments on the proposed remedies. If no adverse comments are received, then Region 6 will approve the permit modification to implement the RCRA caps as final remedies for SWMUs No. 82 and 197. If adverse comments are received, then Region 6 may change the proposed remedy based upon comments received from the public.

Region 6 conducted a review of RCRA and Superfund remedies at pesticide contaminated sites similar to SWMUs 82 and 197. RCRA landfill caps have proven to be an effective remedy for these types of sites. For this reason, Region 6 has selected RCRA landfill caps to be placed over the contaminated areas. Holloman will be required to maintain and repair the RCRA caps once they are completed in order to prevent exposure of the contaminated soil to the environment.

Region 6 rejects Holloman's proposed remedies for SWMUs No. 82 and 197 (IRP Sites No. 8 and 14 respectively) which included leaving the contaminated soil in place and paving the sites with asphalt. Region 6 is aware that Holloman wishes to drive heavy-duty trucks across these sites once the asphalt is in place. Region 6 does not believe that the proposed institutional controls and inevitable degradation of the asphalt are sufficient to prevent exposure to the contaminated soil. The New Mexico Environment Department's Hazardous and Radioactive Materials Bureau (HRMB) was consulted in this decision and HRMB also believes that Holloman's proposed asphalt paving of the sites is insufficient.

If you have any questions regarding this letter, please contact Lowell Seaton of my staff at (214) 665-8304.

Sincerely yours,

Jack Dinta

for Allyn M. Davis, Director
Hazardous Waste Management Division

cc: Ms. Kathleen M. Sisneros, Director
Water and Waste Management Division
New Mexico Environment Department