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**MEMORANDUM**

TO: Barbara Hoditschek, RCRA Permits Program Manager  
FROM: Ron Kern, RCRA Technical Compliance Program Manager *RK*  
DATE: December 28, 1994  
SUBJECT: **Sampling and Analysis and Closure Plans and Remediation Waste Cleanup: JP-4 Spill Sites, Holloman Air Force Base**

At your request, the Technical Compliance Program has done an evaluation of the December, 1994 Sampling and Analysis Plans and remediation waste cleanup criteria for two JP-4 spills at Holloman Air Force Base (HAFB). The site 1 spill occurred November 4, 1992 near Building 1080 and resulted in a release of 1,013 gallons of JP-4. The site 2 spill occurred also during 1992 at the Hensel Phelps site (F-117A maintenance Docks/Hangar Project) and resulted in the release of an unspecified quantity of JP-4.

With the limited Photo-Ionization Detector (PID) data and correlative information about the removal activity of contaminated soils from the Building 1080 site, there is a reasonable probability that the site has been adequately cleaned up. HAFB, however, does note that soil samples were taken and analytical results are to be forwarded to HRMB.

There is no information to support a conclusion that an adequate cleanup has occurred at the Hensel Phelps spill site. ✓

**GENERAL COMMENTS:**

1. Title: The proposed plan should be titled "Sample and Analysis and ~~Closure Plan~~ for Soil Remediation Wastes from Building 1080 and Hensel Phelps Construction Site".
2. Introduction (1a): The 3rd edition with Update I (July, 1992) of EPA SW-846 has been finalized and is the correct citation.
3. Data Quality Objectives (2a,b): Procedures for decontamination of sampling equipment are not addressed adequately. It is to the benefit of the facility, however, to ensure that contamination is not carried between sampling sites and transmitted to subsequent environmental samples. Therefore, HRMB may assume, considering the scope of the proposed investigations, that HAFB will provide adequate decontamination of sampling instruments.

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4. Data Quality Objectives (2d): Benzene, Toluene, Ethylbenzene, and total Xylenes (BTEX) are appropriate to analyze for, using SW-846 or equivalent methods. HAFB is planning to use cleanup criteria of 10 ppm for BTEX, except for total xylene which shall be less than 3 ppm. These levels are appropriate to determine whether the soils at the two treatment sites have been adequately remediated. Additionally, these levels may be considered appropriate to a TCLP determination: Benzene is the only TCLP constituent of concern (TCLP level = 0.5 mg/l); using the "twenty times rule", if the total concentration of benzene in soil is less than 10 ppm, it should also be less than 0.5 mg/l in a TCLP analysis. HAFB should probably clarify, for technical completeness, which method(s) they will use to determine if these soils have a characteristic hazardous waste (i.e. TCLP; "Twenty Times Rule").

5. Sample Procedures (4d): See comment number 2 above for the appropriate SW-846 citation.