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Mark E. Weidler
Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 9, 1995

Howard E. Moffitt
Deputy Base Civil Engineer
49 CES/CEV
550 Tabosa Ave
Holloman AFB NM 88330-8458

RE: Sampling and Analysis Plan and Remediation Waste Cleanup
Criteria for Two JP-4 Spills at Holloman Air Force Base (HAFB)

Dear Mr. Moffitt:

NMED has received the sampling and analysis plan for two spill sites located at Holloman Air Force Base (HAFB). The site 1 spill occurred November 4, 1992 near building 1080 and resulted in a release of 1,023 gallons of JP-4. The site 2 spill at the Hensel Phelps site (F-117A maintenance docks/hanger project) also occurred in 1992, and resulted in the release of an unspecified quantity of JP-4.

At this time, NMED has not determined that an adequate cleanup has occurred at either site. NMED is awaiting receipt of sampling results on these sites before a determination will be made.

In the interim, I have requested Technical Staff to review the revised sampling and analysis plan for the subject spill sites, and items documenting the clean-up actions at building 1080 which HAFB submitted December 22, 1994. The following are general comments regarding these documents:

1. Title: The proposed title should read "Sample and Analysis for Soil Remediation Wastes from Building 1080 and Hansel Phelps Construction Site".
2. Introduction: Change the wording in the first sentence to read "This sampling plan is submitted for clean-up of the two spill sites (identify the sites) at..."
3. Introduction (1a): The 3rd edition with Update I (July, 1992) of EPA SW-846 has been finalized and is the correct citation.

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

NMED will approve the sampling and analysis plan and make a determination on adequate cleanup of the sites when HAFB submits the revised plan with NMED's recommended changes and the sampling data NMED requested on the two sites.

NMED also recommends HAFB consider including into their permit a standard operating procedure (e.g as part of their contingency plan) to address on-site clean-up of spills.

Your prompt cooperation is appreciated.

Sincerely,



Barbara Hoditschek, Prog, Mgr.

CC: Benito J. Garcia, Chief
Ron Kern, Prog. Mgr.
✓File-Red
File-Reading