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MEMORANDUM

TO: Barbara Hoditschek, RCRA Permits Program Manager
FROM: Ron Kern, RCRA Technical Compliance Program Manager *RK*
DATE: February 15, 1995
SUBJECT: **Sampling and Analysis Plans and Remediation Waste Cleanup
Criteria: JP-4 Spill Sites, Holloman Air Force Base**



At your request, the Technical Compliance Program has done an evaluation of the February 9, 1995 revised Sampling and Analysis Plans and remediation waste cleanup criteria for two JP-4 spill sites at Holloman Air Force Base (HAFB). These spill sites are the Building 1080 and Hansel Phelps (F-117A maintenance docks/hangar project) sites.

One of our previous concerns was whether an adequate cleanup had been conducted at the two JP-4 spill sites. For the Building 1080 spill site, HAFB has now provided information which indicates that the cleanup, based upon confirmation samples (November, 1992) may have been inadequate. HAFB proposes to resample in locations 2, 9, 10, 11, and 12. (Note that sample results for locations 5 through 9 are missing). Based upon the absence of sample data, or the previous occurrence of benzene-contaminated soil samples, I propose that HAFB resample minimally in the following Building 1080 locations: 1, 2, 6, 8, 9, 10, and 11. HAFB should take adequate Quality Control (QC) samples. HAFB's proposed analysis of Benzene and Total Petroleum Hydrocarbons is adequate.

There are still no information to support the conclusion that an adequate cleanup has occurred at the Hansel Phelps site. HRMB should probably request some basic information or a proposal for HAFB to resample the site, as is being proposed for the Building 1080 site.

The Sampling and Analysis Plans for the Building 1080 spill site (with the exceptions noted above) and the two remediation waste cleanup sites appear to be adequate.