

MEMORANDUM

TO: Stephanie Kruse, RCRA Permits Program

FROM: Ron Kern, RCRA Technical Compliance Program Manager *RK*

DATE: March 30, 1995

SUBJECT: **Concerns of Listed Waste in Media at the Sewage Lagoons,
Holloman Air Force Base (HAFB)**

At your request, the Technical Compliance Program has completed an evaluation of the concerns and/or presence of listed waste in environmental media at the Sewage Lagoons, HAFB. Based upon 1985 information provided by HAFB to EPA, the following list constitutes the listed wastes discharged to the Sewage Lagoons:

<u>CONSTITUENT</u>	<u>HAZ. WASTE NO.</u>
Acetone	U002
Acetonitrile	U003
Arsenic trioxide	P012
Carbon tetrachloride	P095 (actually U211 now)
Chlor. fluorocarbons (Freon 113)	F001
Formaldehyde	U122
Methanol	U154
Methylene chloride	F001
Methyl isobutyl ketone	F003/U161
Naphthalene	U165
Phenol	U188
Propionic acid	U233 (? now)
Sodium cyanide	P106
Toluene	U220
Trichloroethane	U227
Trichloroethene	U228
Xylene	U239

Determination of the presence (i.e. detection) of listed waste(s) in sludges, soils, and/or groundwater at the Sewage Lagoons was based primarily on information provided in HAFB's February, 1995 document "Project Assessment Report, Sewage Lagoons and Lakes Investigation". The data for sludges and soils at the Sewage

Lagoons relate to a 1992 sampling event (August, 1992 Report):

<u>POND</u>	<u>MEDIUM</u>	<u>CONSTITUENT/(CONCENTRATION)</u>
A	-----	-----
B	-----	-----
C	Sludge	Acetone (2300 ppb); Xylenes (130 ppb)
D	-----	-----
E	-----	-----
F	Sludge	Acetone (1400 ppb); Xylenes (38 ppb)
G	Soils	Methylene chloride (37 ppb)

(Note: The August, 1992 "Site Characterization Report, Sewage Lagoon Investigation has the associated QA/QC information for the above data. None of the above results is qualified. The occurrences and concentrations of these listed hazardous wastes are valid).

Therefore, listed hazardous wastes have been detected in sludges and soils at the Sewage Lagoons, as reported in a August, 1992 HAFB report. Listed hazardous wastes have not been detected in the groundwater at the Sewage Lagoons.

Nevertheless, because the sewage lagoons are still in use, and will continue in use until HAFB brings on-line a proposed sewage treatment plant, the current concerns of listed waste may be incidental.

HAFB has prepared a January, 1994 document entitled "Draft Final Conceptual Plan for Additional Sampling, Sewage Lagoons and Lakes Investigation". This plan addresses sampling and analysis of sludges and soils at the Sewage Lagoons. Although this plan has not been approved by HRMB, a similar plan (contained within the proposed Closure Plan) might be appropriate if it addresses listed waste concerns, as well as organochlorine pesticides and metals, and is implemented at the time the Sewage Lagoons were discontinued. A comprehensive plan would allow determination of any listed waste concerns in the environmental media, determination of baseline risk associated with hazardous constituents in environmental media, and determination of whether clean closure or closure in place with long-term monitoring is appropriate.