



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

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

Dear Mr. Moffitt:

The Environmental Protection Agency (EPA) Region 6 has reviewed Holloman Air Force Base's Phase II RCRA Facility Investigation (RFI) Workplan for the Air Base Sewer System received April 18, 1995.

The EPA hereby decides that no further investigation is required for the Base Sewer System. This decision is based upon site-specific environmental factors that are unique to Holloman AFB.

The New Mexico Environment Department (NMED) imposed specific ground water cleanup standards for Holloman AFB in a letter dated January 25, 1993. These cleanup standards were reiterated in another letter dated May 15, 1995. In summary, NMED requires Holloman AFB to remove all free floating hydrocarbon products from the ground water and to protect the ground water from additional contamination.

The EPA's policy on ground water protection is found in the National Oil and Hazardous Substance Contingency Plan (NCP) Section 300.430(a)(1)(iii)(F) which states "EPA expects to return usable ground waters to their beneficial uses wherever practicable." However, the ground water at Holloman does not have any current beneficial uses due to the high total of dissolved solids (TDS) levels (i.e. greater than 10,000 ppm) and therefore, cannot be "returned to beneficial uses." An additional factor in EPA's decision is the very slow movement of ground water at the base. Ground water moves only 2 to 50 feet per year at Holloman Air Force Base. Due to the large area of Holloman, ground water could take over 1,000 years to reach the base's boundary.

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(insert) Water

In accordance with NMED's and EPA's ground water policy, Holloman AFB shall prevent additional ground water contamination from the base sewer system. This shall include repairing the sewer lines as needed and prohibiting disposal of hazardous wastes into the sewer system. Holloman may suspend the RFI for the base sewer system at this time. However, EPA may require Holloman to complete the Phase II RFI if future information indicates that the base sewer system is a continuing source of ground water contamination.

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

Sincerely yours,

Allyn M. Davis, Director
Hazardous Waste Management Division