



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

*For K/D
Stade P/L
St. Howard K
File 8/1/95*

JUL 21 1995

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.

It appears at this time 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.

EPA's Superfund policy on ground water protection is found in the National Oil and Hazardous Substance Contingency Plan (NCP) Section 300.430(a)(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 high Total Dissolved Solids (TDS) levels. Therefore, this NCP requirement is not appropriate for Holloman.

EPA's proposed Subpart S corrective action rule specifies three conditions under which EPA may not require remediation of a release of hazardous constituents to the ground water. Proposed CFR 264.525(d)(2)(ii) state "The Regional Administrator may determine that remediation . . . is not necessary if the permittee demonstrates . . . the constituent(s) is present in ground water that: (A) Is not a current or potential source of drinking water, and (B) Is not hydraulically connected with waters to which the hazardous constituents are migrating." Holloman's ground water appears to meet these conditions.

The preamble to Subpart S also states "The Agency does not believe that continued further degradation of the environment should be allowed, even in those situations where actual clean up of releases may not be required." Region 6 expects Holloman to control further releases to the environment from the sewer system as a condition of EPA's decision to suspend the RFI.



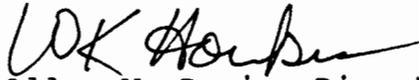
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In accordance with EPA's ground water policy, Holloman shall prevent additional ground water contamination from the base sewer system. This shall include repairing the sewer lines as needed and prohibiting disposal of hazardous wastes into the sewer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

Holloman should submit a Class 3 permit modification in accordance with CFR 270.42(c) to remove the Air Base Sewer System from the RFI requirements. Holloman should request a no further action remedy decision as the basis for the permit modification request. EPA will prepare a draft permit and Statement of Basis incorporating the Class 3 permit modification request. The decision to remove the Air Base Sewer System from the RFI will become final only after the Statement of Basis is public noticed and the public has had the opportunity to comment on the proposed decision.

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

cc: Mr. Benito Garcia ✓
New Mexico Environment Department

HOLLOMAN AIR FORCE BASE
ALAMOGORDO, NEW MEXICO
DECISION TO SUSPEND RFI FOR BASE SEWER SYSTEM

- The HSWA permit included the investigation for the base sewer system.
- Holloman has completed a Phase I RFI for the sewer system. Investigation techniques included review of existing as-built-drawings of the lines and manholes in order to identify the lines of concern. Once the sewer lines were identified, the lines were smoke tested to determine breaks, the manholes were visually inspected, and a TV camera was run down the lines that were not blocked or surcharged with water.
- The base sewer system consists of over 150,000 linear feet of lines. Results of the investigation showed that over 75% of the old clay tile lines had been replaced and abandoned in place. Only about 30% of the lines were able to be inspected with a TV camera due to blockage or collapse of the lines.
- Most of the sewer lines are beneath the water table so ground water flows into the sewer line. Holloman has determined that approximately one third of the waste water treated by the sewer plant is due to inflow of ground water.
- The RCRA Peer Review committee has reviewed the proposed RFI and has recommended no further investigation is needed due to unique environmental factors at Holloman. Peer Review also recommended continued monitoring of the sewer system to verify that the conditions of this decision do not change.
- EPA's decision based upon 3 factors:
 1. Prevention of future ground water contamination is assured since most of the sewer lines are new or repaired
 2. Only clean up of free-floating product is required by the State
 3. Remediation of dissolved phase contaminants is not expected based upon risk criteria due to very salty natural ground water and lack of environmental receptors
- EPA action is in agreement with NMED policy. NMED has reviewed the draft letter and made comments to EPA.