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GOVERNOR

State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
*Hazardous & Radioactive Materials Bureau*  
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**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

February 16, 1996

Howard E. Moffitt  
Deputy Base Civil Engineer  
49 CES/CEV  
550 Tabosa Avenue  
Holloman Air Force Base, New Mexico 88330-8458

**RE: Discrete and NOT Composite Sampling**

Dear Mr. Moffitt:

This letter is a follow-up on the meeting of February 7, 1996 between Holloman Air Force Base (HAFB), Radian Corporation, and the New Mexico Environment Department (NMED), Hazardous and Radioactive Materials Bureau (HRMB) representatives. During that meeting it was agreed that Cornelius Amindyas of my staff should explain the rationale for NMED's insistence, that HAFB conduct discrete soil sampling (quarterly), and **NOT composite** sampling at the HAFB 20,000-pound open detonation (OD) treatment unit.

HRMB wishes to inform HAFB that it is the policy of both the U.S. Environmental Protection Agency (EPA), and NMED that all facilities permitted to conduct open burn and open detonation operations be required to carry out random discrete soil sampling, as opposed to composite soil sampling; for easy delineation of constituent contaminant plumes. Hence, NMED does not accept compositing of post-OB or OD disturbed soil samples.

Further, in order to be consistent with NMED's (and EPA's) requirement for all facilities conducting OB/OD activities, Holloman Air Force Base must:

Submit a soil sample location map to HRMB indicating:

- (1) where random soil samples will be taken with respect to the bottom of the pit resulting from the proposed OD activities;
- (2) the location of discrete random samples that will be taken from the sides of the pit resulting from the proposed OD activities;

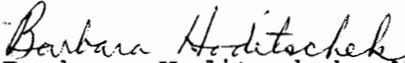
Mr. Moffitt, HAFB  
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- (3) the location of discrete random samples that will be taken from the perimeter of the OD unit; and
- (4) the location of discrete background samples that will be taken from an area that has not been impacted by operations at the OD unit.

The map should carry a legend indicating the soil sample locations, a North arrow, the scale of the map, the boundaries of the OD unit, the berms and fence surrounding the subject unit. The required map should be submitted to NMED not later than March 7, 1996.

If you have any questions regarding this matter you may call me or Cornelius Amindyas at (505) 827-1561.

Sincerely,

  
Barbara Hoditschek, Manager  
RCRA Permitting Program  
Hazardous and Radioactive Materials Bureau

cc: Benito Garcia, Chief, HRMB  
David Neleigh, EPA (6PD-N)  
Kim Hill, HRMB  
David Scruggs, HAFB  
Cornelius Amindyas, HRMB  
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