



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

AUG 20 1996



Mr. Benito Garcia, Chief
New Mexico Environment Department
Hazardous and Radioactive Materials Bureau
2044A Galisteo St.
Santa Fe, NM 87505

Re: **Review of Holloman Air Force Base - Table 3 RFI Report,
EPA I.D. No. NM5672124422**

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has completed its review of Holloman Air Force Base (AFB) RCRA Table 3 RFI Report submitted by HAFB on July 25, 1995. Enclosed is a list of deficiencies which EPA recommends that HAFB be allowed sixty days to respond.

Based upon the sampling results presented in the Report, EPA recommends that eleven (11) sites be removed from HAFB current RCRA/HSWA permit and that the Class 3 permit modification not be initiated by HAFB until all comments have been resolved.

If you have any questions or need additional information, please contact Allen T. Chang of my staff at (214) 665-7541.

Sincerely yours,


David W. Neifeigh, Chief
New Mexico/Federal Facilities
Section

Enclosure

REVIEW SUMMARY

This RFI Report provides information the following SWMUs:

Phase I: SWMUs 9, 19, 20, 24, 25, 29, 35

Phase II: SWMUs 1, 7, 11, 12/13, 14, 16, 23, 27, 28,
31, 34, 37, 38, 41, 231

Based upon the information provided, the proposals have been grouped as follows:

Sites Where No Further Action (NFA) Appears Appropriate

A. Based upon the information provided, EPA tentatively agrees with the NFA proposals for the following sites:

SWMU 4 ✓ - Leach Field-Building 131 O/WS
SWMU 20 ✓ - Building 639 O/WS
SWMU 25 ✓ - Building 805 O/WS
SWMU 35 ✓ - Building 903 O/WS
SWMU 231 ✓ - Incinerator/Landfill

B. Since these sites are currently in use, HAFB shall extend its current maintenance programs to monitor these sites for Total Recoverable Petroleum Hydrocarbons (TRPH) at least once a year.

SWMU 9 ✓ - Building 282 O/WS
SWMU 16 ✓ - Building 315 O/WS
SWMU 24 ✓ - Building 801 O/WS
SWMU 34 ✓ - Building 902 O/WS
SWMU 37 ✓ - Building 1080 O/WS
SWMU 38 ✓ - Building 1080A O/WS

Sites Where Additional Information is Needed

Subject to the receipt and review of additional information or investigation, the following sites may be reconsidered for NFA:

SWMU 7 ✓ - Building 198 O/WS
SWMU 11 ✓ - Building 300 O/WS
SWMU 12/13 - Buildings 304/304A O/WS
SWMU 20 ✓ - Building 639 O/WS
SWMU 23 ✓ - Building 800 O/WS

Sites Where Conditional No Further Action (CNFA) is Proposed

A Voluntary Cleanup Action (VCA) is planned or is undertaking on those sites. NFA determination of the sites would not be considered. Following the completion of VCA, HAFB shall submit the final confirmatory sampling and analytical results, and detailed remedial actions for NFA determination:

- SWMU 1 - Building 55 O/WS
- SWMU 7 - Building 198 O/WS
- SWMU 11 - Building 300 O/WS
- SWMU 12/13 - Buildings 304/304A O/WS
- SWMU 14 - Building 306 O/WS
- SWMU 19 - Building 638 O/WS
- SWMU 23 - Building 800 O/WS
- SWMU 27 - Building 810 O/WS
- SWMU 28 - Building 822 O/WS
- SWMU 29 - Building 827 O/WS
- SWMU 31 - Building 855 O/WS
- SWMU 41 - Building 1266 O/WS

LIST OF DEFICIENCIES

Holloman Air Force Base (HAFB) RFI Report - Table 3 SWMUs

General Comments:

1. For sites which are active and which NMED/EPA approves for No Further Action (NFA), HAFB shall extend its current maintenance programs to monitor each oil/water separator for Total Recoverable Petroleum Hydrocarbons (TRPH) at least once a year. (Best Professional Judgement (BPJ))
2. For sites which are planned or are undertaking a Voluntary Cleanup Action (VCA), NFA determination is pending until VCA is complete and HAFB submits the final confirmatory sampling and analytical results, and detailed remedial actions. (BPJ)

Site Specific Comments:

1. Page 1-2, Section 1.2.1: For SWMUs (3, 4, 8, 10 and 18), HAFB will conduct their removal and shall submit confirmation sampling to NMED/EPA for determination of NFA. (BPJ)

SWMU 20 - Building 639 O/WS

2. Page 4-14, Section 4.4.2: Since the area surrounding SWMU 20 is currently undertaken VCA in conjunction with the T-38 Test Cell Fuel Spill (SWMU 229), NFA determination is pending until VCA is complete and HAFB submits the final confirmatory sampling and analytical results, and detailed remedial actions. (BPJ)

SWMU 7 - Building 198 O/WS

3. The HAFB's proposed VCA shall include both the remediation of vadose zone soils and the mitigation of the leakage from the pipe and/or the separator. (BPJ)

SWMU 11 - Building 300 O/WS

4. Page 5-30, Section 5.3.6: HAFB's VCA shall include both SWMU 11 related vadose zone soils with TRPH concentrations greater than 1,000 mg/kg and the area of elevated TRPH south of the SWMU. (BPJ)

SWMU 23 - Building 800 O/WS

5. Besides remediation of the contaminated soils, HAFB's VCA plan shall identify and mitigate the release pathway which could be either a leaking O/WS chamber or piping. (BPJ)