

MEMORANDUM

TO: Stephanie Kruse  
FROM: Carl Will *CW*  
DATE: March 27, 1997  
SUBJECT: Peer Review - Holloman Air Force Base Sewage Lagoons Closure Plan

I have completed my review of the above-referenced Closure Plan and related documents and have the following comments:

- 1) Appendix E, Risk Assessment Addendum - The ecological risk assessment is limited to aquatic environment and uses ducks as the highest trophic level end point. Is there a need to look at terrestrial risks and the highest trophic level, for example raptors feeding on prairie dogs living at the filled in lagoons? *No.*
- 2) Section 6, Closure Documentation Summary, 6.2.1 Clean Water Act, p. 6-6 - The Summary states that because this site is DERA funded it is a CERCLA site and permits are not required for closure activities. I think that some DOD people make the argument that DERA sites are CERCLA sites and therefore are not required to be RCRA permitted at all. I am concerned that HRMB approval of this statement in the Plan could support that DOD argument. Although this site is DERA funded it is a RCRA site. *w/ding ch'ed.*
- 3) Legal Notice and Fact Sheet, p. 2 - It may be helpful to the public to include the regulatory citation for the "mixture rule." *Done.*
- 4) Typos are marked on the documents by post-it notes. *Done.*

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