MEMORANDUM

TO: Stephanie Kruse
FROM: Carl
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.

3) Legal Notice and Fact Sheet, p. 2 - It may be helpful to the public to include the regulatory citation for the "mixture rule."

4) Typos are marked on the documents by post-it notes.