

HAFB 97



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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

May 7, 1997

Howard E. Moffitt
Deputy Base Civil Engineer
49 CES\CEV
550 Tabosa Ave
Holloman Air Force Base, N.M. 88330-8458

**SUBJECT: Notice of Deficiency, RCRA Facility Investigation (RFI)
Phase II Report for Table I SWMUs
Holloman Air Force Base, EPA I.D. No. NM6572124422**

Dear Mr. Moffitt:

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) has completed a technical review of the RCRA Facility Investigation Phase II Report dated June 1995, for the Table I Solid Waste Management Units (SWMUs). HRMB's comments reflect and include comments of this RFI review conducted by Region VI EPA previously submitted to HRMB. Enclosed is a list of deficiencies for Holloman Air Force Base (HAFB) to address.

HAFB must submit the information requested in the enclosed list of deficiencies within thirty (30) calendar days from the date you receive this letter.

If you have any questions, please contact Cornelius Amindyas or Jerry Bober of my staff at (505) 827-1563.

Sincerely yours,

A handwritten signature in cursive script that reads "Benito Garcia".

Benito Garcia, Chief
Hazardous and Radioactive Materials Bureau

cc: Benito Garcia, Chief, HRMB
David Neleigh, EPA Region 6

FILE: HSWA, HAFB, 97
TRACK: HAFB, 5/7/97, HAFB, HRMB, NOD, Table I SWMUs.

ATTACHMENT

NOTICE OF DEFICIENCY, TABLE I, PHASE II RFI REPORT

HOLLOMAN AIR FORCE BASE (HAFB)

Introduction:

The subject RFI Report includes information on the following Solid Waste Management Units (SWMUs):

- SWMU 82 - Building 131 Washrack
- SWMU 102 - Acid Trailer Disposal Site
- SWMU 104 - Former Army Landfill
- SWMU 134 - Building 920-924 Drainage Ditch
- Fire Department Training Area (FTA) (SWMUs 170, 171, JP-4)
- SWMU 197 - Former Entomology Shop
- AOC-P - Building 301 Fuel Tank Leaks
- AOC-T - POL Storage Tank Leaks

Based upon the information that HAFB provided to NMED, the proposals have been grouped as follows:

1. Sites Where No Further Action (NFA) Appears Appropriate:

Based upon the information that HAFB provided, NMED tentatively agrees with the NFA proposals for the following sites:

- SWMU 102 - Acid Trailer Disposal Site
- SWMU 134 - Building 920-924 Drainage Ditch
- SWMU 171 - Burn Area in FTA

2. Site 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 104 - Former Army Landfill
- AOC-P - Building 301 Fuel Tank Leaks

3. Sites Where Voluntary Corrective Action (VCA) is Proposed or Being Undertaken:

Further information such as final confirmatory sampling and analytical results and detailed remedial action are to be provided on these sites prior to approval of NFA:

SWMU 82 - Building 131 Washrack

SWMU 170

SWMU 197 - Former Entomology Shop

JP-4 - Tank Area

AOC-T - POL Storage Tank Leaks

General Comments

For sites which are slated for Voluntary Corrective Action (VCA) or are undergoing VCA, a No Further Action determination is pending until the VCA is completed and HAFB submits the final confirmatory sampling and analytical results, and detailed remedial actions.

HAFB must address the following site-specific deficiencies:

1. SWMU 104 - Former Army Landfill (IRP Site LF-29)

Page 4-15: Section 4.3.2, third sentence:

("Groundwater samples were collected and analyzed for VOCs, total metals, organophosphorus pesticides, organochlorine pesticides, polychlorinated biphenyls (PBCs), explosives, chlorinated herbicides, anions, and TDS.")

Since no soil samples were ever collected at the site due to the dangers associated with sampling an area potentially containing unexploded ordnance, HAFB shall establish institutional controls and continue to monitor the ground water for VOCs, and SVOCs on yearly basis.

2. AOC-P - Building 301 Fuel Tank Leaks

HAFB shall either perform a corrective measure study or propose a voluntary corrective action for the (AOC-P) site. Therefore, NFA proposal will not be considered at this time.