

HAFB 97



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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

June 25, 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, Closure Report for Petroleum, Oil and
Lubricant (POL) Contaminated Sites
EPA I.D. No. NM6572124422**

Dear Mr. Moffitt:

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) has completed a review of the HAFB POL site closure report of April 1997. The Report covered 22 Solid Waste Management Units (SWMUs).

After reviewing the Report, the NMED has found it to be administratively incomplete and technically inadequate. The enclosed Attachment A lists additional information that HAFB must submit to HRMB before the Report can be considered for approval. The information requested in Attachment A must be submitted to NMED within thirty (30) calendar days from the date you receive this letter. Please incorporate the required information into the April 1997 Report, and present the revised version to HRMB in two hard copies, and on a 3.5" diskette compatible with Word Perfect 5.2. Your usual cooperation in submitting the necessary information promptly will expedite NMED's final determination on the subject Report.

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: Stu Dinwiddie, PM, HRMB
David Neleigh, EPA Region VI

FILE: HSWA, HAFB, 97
TRACK: HAFB, 6/25/97, HAFB, HRMB/CA, NOD, POL Report.

ATTACHMENT A

NOTICE OF DEFICIENCY: ADMINISTRATIVE COMPLETENESS AND TECHNICAL ADEQUACY OF VOLUNTARY CORRECTIVE MEASURES PETROLEUM, OIL AND LUBRICANT SITE REPORT.

HOLLOMAN AIR FORCE BASE (HAFB) .

June 25, 1997

Introduction:

The following comments by the Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department (NMED), relate to the HAFB April 1997 Voluntary Corrective Measures (VCM) Report for twenty two (22) HAFB Solid Waste Management Units (SWMUs). These SWMUs comprise the petroleum, oil, and lubricant (POL) contaminated sites of HAFB.

The subject VCM POL Closure Report includes information on the following SWMUs:

- **Table 2 SWMUs: Removal of oil/water separators (O/WSs), waste oil tanks (WOTs), and soil contaminated with POL:**
 - SWMUs 2 and 119: Building 121 O/WS and WOT, respectively
 - SWMU 21 and 22: Abandoned O/WSs for Buildings 702 and 704 respectively
 - SWMUs 39 and 127: Building 1092 O/WS and WOT respectively
 - SWMUs 40 and 128: Building 1166 O/WS and WOT respectively
 - SWMUs 36 and 126: Building 1001 O/WS and WOT respectively
- **Table 3 SWMUs: Removal of O/WSs, WOTs and Soil Contaminated with POL**
 - SWMU 1: Building 55 O/WS
 - SWMU 7: Building 198 O/WS
 - SWMU 11: Building 300 O/WS
 - SWMUs 12 and 13: Buildings 304 and 304A O/WSs
 - SWMU 19: Building 638 O/WS
 - SWMU 25: Building 805 WOT

SWMU 27: Building 810 O/WS
SWMU 29: Building 827 O/WS
SWMU 31: Building 855 WOT
SWMU 35: Building 903 O/WS
SWMU 41: Building 1266 O/WS

GLOBAL COMMENTS:

Note: The language in bold print enclosed within parentheses is quoted directly from the text of the April 1997 document. HRMB's comments follow the quotations.

- 1) Section 1.4, page 1-4, first paragraph, *Technical Approach*:
("The RFI/Remedial Investigations (RIs) **previously conducted at the identified Table 2 and 3 SWMUs established that, no constituents exceeding site-screening levels or established background levels are present in soil with the exception of total petroleum hydrocarbons (TPH).**")

This is the only place in the Report which indicates that HAFB had a constituent of concern (COC). HAFB must therefore submit a list of COCs accompanying the revised version of this, and each site restoration report/description, from this date forward. A summary of how the list of COCs was developed must be included in each Report. This will make it easier for HRMB during review of subsequent site restoration reports for each SWMU.

- 2) Provide a detailed facility-wide, and SWMU-specific ground water monitoring program that will be implemented at HAFB. Include a description of the vertical and horizontal extent of the contaminant plume at the petroleum, oil and lubricant site, and how HAFB plans to remediate the impacted ground water. Describe where the ground water monitoring wells will be installed, and the monitoring frequency.
- 3) Provide the dimensions of soil contamination at each of the SWMUs/WOTs, and explain how the horizontal and vertical extent were determined during the 1994 and 1995 RFIs. The estimated area of soil contamination is mentioned, but not stated in the last sentence of the first paragraph of each of the 18 Sections of the Report. Please include the spacial dimensions of each SWMU in the revised Report.

- 4) Page 1-1, paragraph 2, first sentence: ("Field work associated with these activities has continued since January 1996 and is estimated to be completed by May 1997.")

Provide an account on the status of the POL site remedial work that was expected to end by May 1997 as stated above in comment 4).

- 5) Page 1-2, paragraph 2, first sentence: ("Soil contaminated with POL exceeding applicable Base remediation standards was identified during previous RCRA Facility Investigations (RFIs)....")

Explain how the site remediation standards quoted above were established for HAFB.

- 6) Section 1.4, page 1-4, paragraph 3, third sentence: ("During field operations, Tables 2 and 3 O/WS and WOTs were removed with the exception of SWMUs 1, 11, and 41, which are in good working order, have good integrity, and will remain in service as sediment traps.")

Explain how the integrity of the oil/water separators and waste oil tanks was determined, and the basis on which the O/WSSs and WOTs were found to have good integrity.

- 7) Section 1.5, page 1-5, second paragraph, third sentence: ("SWMU 27 soil was analyzed for lead (Pb), volatile organic compounds (VOCs), and semi-volatile organic compounds (SVOCs).")

Explain the origin of Pb in the petroleum contaminated soil at SWMU 27.

- 8) Table 1-1, page 1-6, column 3: Provide a revised Table 1-1, which includes the units of the soil volume excavated for each SWMU, as those stated for SWMU 36/126, and SWMU 27 (See the third column).

- 9) Figure 6-1, SWMUs 40, and 128, Section 6.5, page 6-4: Explain why SWMU 138 is indicated on the site map, but not addressed in the Report.

- 10) "Figure 15-1", Section 15.5,, page 15-3, ("SWMU 29 Site Map"):

Explain why SWMUs 93 and 230 are shown on the map, but have not been addressed in the Report.

SITE-SPECIFIC COMMENTS:

Based upon the April 1997 POL Report that HAFB submitted to HRMB, the proposals regarding the SWMUs covered in the subject Report have been grouped as follows:

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

Based upon the information that HAFB provided, NMED agrees with the HAFB and recommends that a petition for NFA be submitted for the following sites:

SWMUs 2 and 119: Building 121 O/WS and WOT, respectively

SWMUs 21 and 22: Abandoned O/WSs for Buildings 702 and 704 respectively.

SWMUs 40 and 128: Building 1166 O/WS and WOT respectively

SWMUs 36 and 126: Building 1001 O/WS and WOT respectively

SWMU 1: Building 55 O/WS

SWMU 7: Building 198 O/WS

SWMUs 12 and 13: Buildings 304 and 304A O/WSs

SWMU 25: Building 805 WOT

SWMU 27: Building 810 O/WS

SWMU 31: Building 855 WOT

SWMU 35: Building 903 O/WS

SWMU 41: Building 1266 O/WS

B. Sites Where Additional Information is Needed:

The following sites may be reconsidered for NFA subject to the receipt and review of additional information by NMED or further investigation by HAFB:

SWMUs 39 and 127: Building 1092 O/WS and WOT respectively

SWMU 19: Building 638 O/WS

SWMU 29: Building 827 O/WS

C. Comments on Specific SWMUs and Related Deficiencies:

- 1) SWMU #11; Section 10.5, Page 10-2, last paragraph, "Conclusions and Recommendations", First three sentences ("Only one closure sample indicated TRPH above 1,000 mg/kg. This sample was collected from the base of the excavation at the groundwater table. One of the requirements of the POL restoration is to terminate excavation when groundwater is encountered.")

Explain what contingency plans HAFB has made for long term ground water monitoring and/or remediation at SWMU # 11, since ground water has been impacted by the petroleum, oil and lubricant release. In addition, explain how and when confirmatory drilling, sampling and analysis of subsurface soils below SWMU # 11 will be conducted.

- 2) SWMUs 39 and 127: Building 1092 O/WS and WOT respectively

Provide information about the approximate duration of the remediation that will be conducted at SWMUs 39 and 127 by the FT-31 bioventing system.

- 3) SWMU 19: Building 638 O/WS, Page 12-1, last paragraph: ("Conclusions and Recommendations, The SWMU 19 O/WS was removed and the soil is currently being remediated in situ with the T-38 Test Cell HVDPE system; therefore, this site is recommended for NFA.")

Provide information on when the T-38 Test Cell High Vacuum Dual-Phase Extraction (HVDPE) system data will be used to establish that SWMU 19 has been remediated, and that NFA is plausible.

- 4) SWMU 29: Building 827 O/WS: ("The SWMU 29 O/WS has been removed and all soil is currently being remediated by the Building 828 HVDPE system.")

Explain how HAFB will confirm that the soil cleanup process used at SWMU 29 has been effective, and that the remediation goals have been met.