



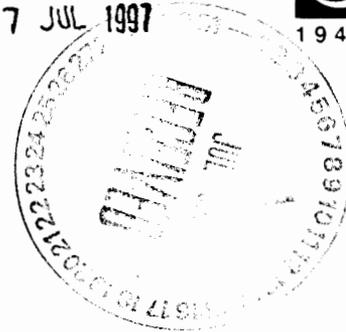
DEPARTMENT OF THE AIR FORCE

HEADQUARTERS 49TH FIGHTER WING (ACC)
HOLLOMAN AIR FORCE BASE, NEW MEXICO

U.S. AIR FORCE



07 JUL 1997



MEMORANDUM FOR US EPA REGION VI (6H-CS)

Attn Mr. Gene Keeper
First Interstate Bank Tower
1445 Ross Avenue
Dallas Texas 75202-2733

FROM: 49 CES/CEV
550 Tabosa Ave
Holloman AFB NM 88330-8458

SUBJECT: Compliance Agreement Quarterly Report

1. Pursuant to the requirements set forth in Section X--REPORTING AND EXTENSIONS section of the Compliance Agreement signed on 20 December 1988, we hereby submit the 34th Quarterly Progress Report (Atch 1). This report will provide a brief outline of events from 1 April-30 June 1997.

2. Documentation for the contents of the attached report is available upon request from the 49 CES/CEV office at Holloman AFB. If you have any questions or comments, contact Dr. Fred M. Fisher at (505) 475-3931.

Howard E. Moffitt
HOWARD E. MOFFITT
Deputy Base Civil Engineer

Attachment:
Compliance Agreement Report

cc: w/Atch
HQ ACC/SJA (Mr. Mike Wells)
HQ ACC/CEVQM (Mr. Larry Isaacs)
HQ ACC/CEVR (Mr. Jim Haggins)

49 FW/JA

NM Environment Department
Hazardous & Radioactive Materials Bureau
Box 26110
Santa Fe NM 87502-6110
Mr. Jerry Bober, and
Ms. Stephanie Kruse

Mr. Mark Wilson
Fish and Wildlife Service
2105 Osuna NE
Albuquerque NM 87113

AFCEE/CCR-D (Mr. Tom Manning)
P.O. Box 116
525 Griffin St
Dallas TX 75202

Mr. Mark Mercier
U.S. Army Corps of Engineers
Omaha District/CEMRO-ED-EA
215 N. 17th Street
Omaha NE 68102-4978

Mr. Robert Michna
Radian Corp
8501 Mo-Pac Blvd.
Austin TX 78720-1088

Mr. Dan Holmquist
Foster Wheeler Corp
Holloman AFB NM

Mr. Raymond P. Churan
Regional Environmental Officer
United States Department of the Interior
P.O. Box 649
Albuquerque NM 87103

Holloman Air Force Base (HAFB) Federal Facilities Compliance Agreement (FFCA)
34th Quarterly Progress Report, 1 April 1997-30 June 1997
Civil Engineer Environmental Flight, 49 CES/CEV, 26 June 1997

3 Apr 97: Received Proposal to Approve Closure Plan for Holloman Air Force Base Sewage Lagoons in a letter from Dr. Stu Dinwiddie, Manager, RCRA Permits Management Program, New Mexico Environment Department (NMED). The proposed approval has the following conditions

1. The Closure Plan must meet all applicable requirements for closure in 20 NMAC 4.1 Subpart VI, and 40 CFR 265.111-116.
2. Quarterly reports must continue and should contain updates of activities, discussion of changes or modifications in closure activities, and listing of actual or anticipated changes in schedule.
3. A Final Closure Report must be submitted by HAFB containing a summary of closure activities, documentation and discussion of variances from the plan, the location and custodian of all closure documentation, a site map of each lagoon, and the location and custodian of all raw data from the 1994 sampling and any other sampling used to evaluate the exposure risk.
4. Long-term groundwater monitoring must continue until NMED has verified the closure.
5. Future land use should be restricted to scenarios evaluated in the site specific risk assessment: for Ponds A-F, scenario for current worker with access 12 days a year for 25 years; and for Lagoon G, scenarios for current worker, hunter, and trespasser.
6. Prepare a deed restriction indicating the land has been used to manage hazardous waste including a survey plat and a record of the type, location, and quantity of hazardous wastes disposed of within each lagoon.

7 Apr 97: NMED Legal Notice of Intent to Approve a Closure Plan for Seven Sewage Lagoons, Holloman Air Force Base, New Mexico is published in the *Albuquerque Journal* and the *Alamogordo Daily News*.

7 Apr 97: Submitted 33rd Quarterly Progress Report.

17 Apr 97: Received a courtesy copy of a letter from Mr. Gordon J. Ewing of the Mesilla Valley Audubon Society Conservation Committee to NMED supporting the proposed closure of the lagoons. The preservation of Pond G as open water was specifically supported because regular observations have not shown any harm to wildlife, Lagoon G is a significant component of the local wildlife habitat, and the storage capacity of Lagoon G will increase the management flexibility of adjacent constructed wetlands and wildlife habitat.

21 Apr 97: Conference call with NMED Hazardous and Radioactive Materials Bureau, U.S. Army Corps of Engineers-Omaha District (USACE), and Radian International LLC (Radian) to discuss the NMED Proposal to Approve Closure Plan. The call focused on conditions 5 and 6 of the Proposal to Approve. Regarding condition 5, Radian and HAFB explained that the risk assessment for current worker scenario was based upon direct contact with sludge. The soil cover eliminates this contact and, therefore, the exposure pathway. There is no reason to limit work exposure as long as the soil cover is intact. HAFB will restrict access to the lagoons in order to ensure the integrity of the cover. NMED tentatively agreed and indicated that appropriate written comments should be submitted for a formal response. Other issues discussed included the nature of the deed restrictions that can be prepared given the fact that Otero County has no zoning authority and does not hold the deed to the lagoons site, which is located on public land withdrawn for military use. HAFB will continue to explore this issue. Methods were discussed for meeting the requirement for listing hazardous wastes disposed of in the lagoons.

23-24 Apr 97: Meeting held at Foster Wheeler Environmental Corporation (FWEC) offices in Denver to review Sewage Lagoons Final Cover Work Plan. Refinements were made to the grading plan to minimize runoff and provide toe slope protection where runoff leaves the site and discharges to a wetlands area. Requirements for erosion control were discussed. Under CERCLA Section 121(e)(1), the formal NPDES permit for storm water discharges (40 CFR 122.26) is not required but the substantive requirements of the permit (9 Sep 92 Federal Register, pp. 41176-41342, Final NPDES General Permits for Storm Water Discharges from Construction Sites) must be met.

2 May 97: HAFB provided written comments to NMED regarding condition 5 of the Proposal to Approve. HAFB suggested that the land use for the lagoons should be restricted open space. The soil cover will prevent any contact with sludge and, therefore, exposure pathways are no longer complete. The site, however, should be restricted in order to ensure the integrity of the soil cover.

5-9 May 97: A spray irrigation system has been installed that removes water from Pond C and sprays out over Pond D. Water is removed from Ponds A and B by pumping into Pond C. Evaporation rates have increased significantly.

16-27 May 97: Spray irrigation continued and free water is nearly gone from Ponds A and B; Pond C water level is 2-3 feet.

2-6 Jun 97: FWEC began using heavy equipment to work sludge in Ponds A and B.

9 Jun 97: Repairs to golf course wet well were successfully completed using an underwater epoxy process. The wet well had been leaking irrigation water into Lagoon F and generally raising the water table.

9-13 Jun 97: FWEC continuing to work sludge in Ponds A and B. This sludge produced odors when turned and 4000 gal of the odor control chemical Bioxide (a proprietary mixture of nitrates and other oxidized nutrient salts) is applied.

17 Jun 97: Received Approval of Closure Plan for Holloman Air Force Base Sewage Lagoons in a letter from Dr. Ed Kelley, Director of Water and Waste Management Division, NMED. Comments were received from NMED Ground Water Quality Bureau, US Fish and Wildlife Service New Mexico Field Services, and the Mesilla Valley Audubon Society. All commenters concurred with the proposed closure. Condition 5 of the Closure Plan was changed in response to comments submitted by HAFB to indicate the future land use of Lagoons A-F will be restricted open space.

24 Jun 97: USACE personnel on-site for planning meeting. Pond B is nearly dry. Pond A is mostly dry except for a few deep holes. The bottom of Pond C is approximately 50% exposed with only shallow water remaining. The odor control measures have been successful.