



DEPARTMENT OF THE AIR FORCE

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

U.S. AIR FORCE



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MEMORANDUM FOR NEW MEXICO ENVIRONMENT DEPARTMENT

Attn: Dr. Stu Dinwiddie
Manager, RCRA Permits Management Program
2044 Galisteo
Santa Fe, NM 87502

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

SUBJECT: Response to Request for Supplementary Information (RSI) on Table 3 Solid Waste Management Units (SWMUs)

1. In response to your 10 September 1997 RSI, Holloman AFB (HAFB) submits the Final RFI Report for Table 3 SWMUs (Atch 1) and the following informational comments. First, in response to General Comment 1, all of the active SWMUs (1, 9, 10, 16, 28, 30, and 37) already have a maintenance program in place. Atch 2, Guidance on Management of Oil/Water Separators, developed by Air Combat Command (ACC) and implemented at HAFB in 1993, outlines the management procedures for all oil/water separators (O/WS) on HAFB. HAFB has an excellent O/WS management program that was recognized as the best in ACC. Under this guidance, O/WSs are inspected at least quarterly and pumped out as required. As similarly discussed in the Response to NMED's Request for Supplementary Information for the Table 2 RFI Report, HAFB recommends the use of ACC's Guidance on Management of Oil/Water Separators to properly manage and inspect those O/WSs which remain active, in lieu of yearly TPH sampling.

2. In regard to General Comment 2, voluntary corrective actions (VCAs) have been completed at SWMUs 1, 3, 4, 7, 8, 10, 11, 12, 13, 14, 18, 19, 23, 27, 28, 29, 31 and 41. The results of the VCAs are presented in three separate documents: 1) *Remediation of POL-Contaminated Sites and Oil/Water Separator Removals, Holloman Air Force Base, New Mexico, July-November 1995* submitted February 1996, 2) *Final Closure Report for Phase II Remediation of (POL) Contaminated Sites and O/WS and WOT Removals, Holloman Air Force Base, New Mexico, July 1997*, and 3) *Addendum to the Final Closure Report for Phase II Remediation of (POL) Contaminated Sites and O/WS and WOT Removals, Holloman Air Force Base, New Mexico* to be submitted in October 1997. Each SWMU-specific section in the attached Final Table 3 RFI Report has been revised similarly to the Final Table 2 RFI Report and will discuss the results of the VCAs.

3. Regarding Site-Specific Comment 1, SWMUs 3, 4, 8, 10 and 18 have all been remediated. Page 1-2, Section 1.2.1 has been revised to include all remedial activities associated with these SWMUs. All of the above SWMUs are recommended for no further action (NFA).

4. In regard to Site-Specific Comment 2, SWMUs 19 (removed) and 20 (inactive) are located within the contaminated plume caused by SWMU 229, the T-38 Test Cell. NFA is recommended for SWMU 20 based upon the HRMB approval of NFA for SWMU 19 with the requirement to submit confirmation boring information upon the remediation of SWMUs 19, 20 and 229 using high-vacuum dual-phase extraction (HVDPE). This HVDPE system is anticipated to operate through 2001. Confirmation borings will be taken across the site, including the area where SWMU 20 is located, to ensure the system has remediated the site to less than 1000 mg/kg.

5. Site-Specific Comment 3 requests the remediation of SWMU 7 and the mitigation of leakage from the piping related to the O/WS. These activities were completed as part of Holloman's Phase 2 Basewide POL project. SWMU 7 was removed as part of the project. Page 5-20, Section 5.2.5 has been revised to provide this information. SWMU 7 is recommended for NFA.

6. In regard to Site-Specific Comment 4, SWMU 11 was removed in 1991. The area to the south is not believed to be related to SWMU 11 since TPH concentrations drop significantly between SWMU 11 and the southern area. However, a VCA was performed as part of Holloman's Phase 2 Basewide POL project. Soil was excavated to the south along with soil near SWMU 11. Approximately 168 cubic yards of soil were excavated. However, no soil with TPH in excess of 1000 mg/kg was found and, therefore, no soil required offsite disposal. Page 5-30, Section 5.3.6 has been revised to provide this information. SWMU 11 is recommended for NFA.

7. Regarding Site-Specific Comment 5, SWMU 23 was removed and remediated as part of Holloman's Phase 2 Basewide POL project. The piping connecting the separator was replaced at that time. No evidence of leakage was found. Page 5-73, Section 5.7.5 has been revised to provide this. SWMU 23 is recommended for NFA.

8. In addition to those SWMUs listed in the RSI, SWMUs 5, 6, 26, 30 and 33 were also recommended and approved for NFA in the Table 3 RFI Workplan submitted in 1994. These SWMUs, discussed on Page 1-2, Section 1.2.1, passed pre-screening criteria set forth in the workplan and were, therefore, approved for NFA. Specifically, SWMUs 5 and 26 were removed several years ago and no evidence of leakage was found during the field screening. SWMUs 6 and 33 are not active O/WSs but instead are used as sediment traps. SWMU 30 is an active O/WS but was fairly new with no evidence of leakage. Since SWMU 30 is active, it is managed in accordance with guidance set forth in Atch 2. Based on the above information, these SWMUs were approved for NFA. HAFB requests these SWMUs be listed with those discussed in the RSI when approval of this report is given.

9. If you have any questions regarding these comments, or require additional information, please contact Warren Neff at (505) 475-5395.



HOWARD E. MOFFITT
Deputy Base Civil Engineer

Attachments:

1. Final Table 3 RFI Report
2. Guidance on Management of Oil/Water Separators