

HAFB 97



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
2044 Galisteo
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-1557
Fax (505) 827-1544



MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

October 23, 1997

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

RE: APPROVAL OF RFI REPORT FOR 32 TABLE 3 SWMUs (and 5 Table 2 SWMUs)
EPA I.D. Number NM6572124422

Dear Mr. Moffitt:

The RCRA Permits Management Program of the New Mexico Environment Department (NMED) has completed review of the Holloman Air Force Base (HAFB) RCRA Facility Investigation (RFI) Report for 32 Table 3, and 5 Table 2 solid waste management units (SWMUs). The HRMB's review incorporated the RFI Report for Table 3, dated July 1995, the POL Report dated February 1996, the Revised RFI Table 3 Report dated September 1997, Revised POL Report dated September 1997, and HAFB's response to HRMB's request for supplementary information of August 11, 1997.

Pursuant to its authority under the New Mexico Hazardous Waste Act, N.M.S.A. 74-4-1 et seq., and regulations promulgated pursuant thereto, and pursuant to Holloman Air Force Base's (HAFB's) Resource Conservation and Recovery Act Hazardous Waste Management Permit (Permit), HRMB approves the subject RFI Report for the Table 3 SWMUs listed in the enclosed Attachment. HRMB also authorizes HAFB to proceed with the next Phase of remediation activities of the petroleum-contaminated soil at those SWMUs where No Further Action (NFA) does not appear appropriate. In addition, HAFB must submit a request for Class 3 Permit Modification for those SWMUs listed in the enclosed Attachment, for which NFA seems adequate.

If you have any questions regarding this matter, you may contact Jerry Bober or Cornelius Amindyas of my staff at (505) 827-1561.

Sincerely,

A handwritten signature in cursive script, reading "Robert S. Dinwiddie".

Robert S. (Stu) Dinwiddie, Ph.D., Manager
RCRA Permits Management Program
Hazardous and Radioactive Materials Bureau

cc: Benito Garcia, Chief HRMB
David Neleigh, EPA Region VI (6PD-N)
Allen Chang, EPA Region VI
Cornelius Amindyas, HRMB

FILE: HSWA, HAFB, 97, T₃
TRACK: HAFB, 10/23/97, HAFB, HRMB/CA, Approval of Table 3 RFI Report

ATTACHMENT

APPROVAL OF TABLE 3 RFI REPORT
HOLLOMAN AIR FORCE BASE

October 23, 1997

Based upon the information that Holloman Air Force Base (HAFB) provided to the New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB), the proposals for the Table 3 solid waste management units (SWMUs) have been grouped as follows:

Sites Where No Further Action (NFA) Appears Appropriate:

- 1) SWMU 1 - Building 55 Oil/Water Separator
- 2) SWMU 3 - Building 130 Oil/Water Separator
- 3) SWMU 4 - Leach Field, Building 131 Oil/Water Separator
- 4) SWMU 7 - Building 198 Oil/Water Separator
- 5) SWMU 8 - Building 231 Oil/Water Separator
- 6) SWMU 9 - Building 282 Oil/Water Separator
- 7) SWMU 10 - Building 283 Oil/Water Separator
- 8) SWMU 12 - Building 304/304A Oil/Water Separator
- 9) SWMU 13 - Building 304/304A Oil/Water Separator
- 10) SWMU 16 - Building 315 Oil/Water Separator
- 11) SWMU 18 - Building 500 Oil/Water Separator
- 12) SWMU 19 - Building 638 Oil/Water Separator
- 13) SWMU 20 - Building 639 Oil/Water Separators
- 14) SWMU 24 - Building 801 Oil/Water Separator
- 15) SWMU 25 - Building 805 Oil/Water Separator
- 16) SWMU 27 - Building 810 Oil/Water Separator
- 17) SWMU 29 - Building 827 Oil/Water Separator
- 18) SWMU 31 - Building 855 Oil/Water separator
- 19) SWMU 35 - Building 903 Oil/Water Separator
- 20) SWMU 36* - Building 1001 Oil/Water Separator
- 21) SWMU 37 - Building 1080 Oil/Water Separator
- 22) SWMU 41 - Building 1266 Oil/Water Separator
- 23) SWMU 101 - Building 121 Old Main Base Landfill

- 24) SWMU 231 - Incinerator/Landfill
- 25) SWMU 126* - Building 1001 Waste Oil Tank
- 26) SWMU 129* - Building 1191 and 1192 Spill Tanks
- 27) SWMU 156* - Imhoff Tanks
- 28) SWMU 164* - Building 1080 Pond
- 29) SWMU 165 - Building 1176 Pond
- 30) SWMU 181* - Building 1176 Drainage Troughs

NOTE: 1) *Wherever an asterisk * appears in front of any SWMU above, it indicates a Table 2 site that was reviewed in the February 1996 POL Report. SWMU # 75 should be omitted from Corrective Action documents, since it is a regulated unit and not a SWMU.*

Table 2 and Table 3 SWMUs Where Further Investigation is Required:

- SWMU 39 - Building 1092 Oil/Water Separator**
- SWMU 127 - Building 1092 Waste Oil Tank**
- SWMU 135 - Oil/Water Separator Drainage Pit**
- SWMU 136 - Building 1119 Washrack Drainage Pit**

SWMUs 39, 127, 135, and 136 are not appropriate for NFA until HAFB has conducted confirmatory drilling following the bioventing remediation work that is being done at these sites.

- AOC-U - Lost River Basin**

The borehole logs of AOC-U have to be provided before a decision can be made on whether or not to categorize it as appropriate for NFA.

- SWMU 118 - Building 21 Pesticide Holding Tank**
- SWMU 132 - Building 21 Leach Field**
- AOC-A - Open Concrete Containment Box**

HAFB must carry out confirmatory drilling of the soil at SWMUs 118, 132, and AOC-A, and submit the data to HRMB before a decision can be made for NFA. Ground water analysis results should also be submitted following each sampling and analysis activity.

- SWMU 177 - Building 1176 Sumps**
- SWMU 179 - Discharge Box**

HAFB must determine the horizontal and vertical extent of trichloroethene (TCE) in the ground water at SWMUs 177 and 179; and install ground water monitoring wells at those sites. HRMB will consider these SWMUs for NFA after HAFB has submitted analytical results which suggest no risk to human health and the environment at the subject locations.

SWMU 11 - Building 300 Oil/Water Separator

HAFB must adequately characterize the existing groundwater contaminant plume at this site (as per NMED's letter of May 15, 1995 to HAFB) and determine the extent of the groundwater contamination. The contamination at SWMU 11 should also be monitored.

SWMU 14 - Building 306 Oil/Water Separator

HAFB must continue remediation work at SWMU 14. This is because the analytical results listed in Table 5.5-2, page 5-56, third paragraph indicate that high levels of acetone, carbon disulfide, ethyl benzene, tetrachloroethene, and trichloroethene were detected above reporting limits.

SWMU 23 - Building 800 Oil/Water Separator

HAFB must conduct more remedial work at SWMU 23 since the analytical data listed in Table 5.7-2 indicate high concentrations of acetone, carbon disulfide, methylene chloride, BTEX, dichlorobenzene and semivolatile organic constituents.

SWMU 28 - Building 822 Oil/Water Separator

HAFB must conduct more remedial work at SWMU 28 since the analytical data listed in Table 5.9-1 indicate high concentrations of total recoverable petroleum hydrocarbons and methylene chloride.

SWMU 34 - Building 902 Oil/Water Separator

HAFB must conduct more remedial work at SWMU 34 since the analytical data listed in Table 5.11-2 indicate high concentrations of cadmium, beryllium, acetone, carbon disulfide, methylene chloride, and bis(2-ethylhexyl)phthalate.

SWMU 38 - Building 1080A Oil/Water Separator

HAFB needs to conduct more remedial work at SWMU 38 because of the high concentrations of benzo(a)pyrene, benzo(a)anthracene, and benzo(b)fluoranthene.