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CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

November 4, 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 PHASE II RFI REPORT FOR TABLE 1 SWMUs  
EPA I.D. Number NM6572124422

Dear Mr. Moffitt:

The RCRA Permits Management Program (RPMP) of the New Mexico Environment Department (NMED) has completed review of the Holloman Air Force Base (HAFB) Phase II RCRA Facility Investigation (RFI) Report for Table 1 solid waste management units (SWMUs) and areas of concern (AOCs). The RPMP's review incorporated the Phase II RFI Report for Table 1 dated June 1995, the POL Report dated April 1997, the revised Phase II RFI Report dated June 1997, the revised POL Report dated July 1997, and HAFB's response to HRMB's May 7, 1997 notice of deficiency.

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), the RPMP approves the subject RFI Report for the Table 1 SWMUs listed on the enclosed Attachment. The RPMP 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 on 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,

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, T<sub>1</sub>  
TRACK: HAFB, 11/4/97, HAFB, HRMB/CA, Approval of RFI Report for Table 1

ATTACHMENT  
EVALUATION OF TABLE 1 SWMUs  
HOLLOMAN AIR FORCE BASE

*November 4, 1997*

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

Based upon HRMB's review of HAFB's September 1997 RFI Report for Table 1 SWMUs and related documents, the following are the solid waste management units (SWMUs) for which No Further Action (NFA) appears appropriate:

- SWMU 102 - Acid Trailer Disposal Site
- SWMU 134 - Building 920-924 Drainage Ditch
- SWMU 171 - Burn Area in FTA
- SWMU 11 - Building 300 Oil/Water Separator
- SWMU 14 - Building 306 Oil/Water Separator
- SWMU 23 - Building 800 Oil/Water Separator
- SWMU 28 - Building 822 Oil/Water Separator
- SWMU 34 - Building 902 Oil/Water Separator
- SWMU 38 - Building 1080A Oil/Water Separator

2. Site Where Additional Investigation is Required:

SWMU 104 - Former Army Landfill

HAFB needs to determine the extent of the contaminant plume at and around SWMU 104, including the upgradient part of the site before HRMB can consider it for NFA.

AOC-P - Building 301 Fuel Tank Leaks

HRMB cannot consider the AOC-P for NFA pending HRMB's review of HAFB's submittal of its recent findings contained in the addendum to the Closure Report on petroleum, oil and lubricant contaminated sites, which HAFB plans to submit to HRMB by the end of 1997.

SWMU 197 - Former Entomology Shop

Table 4.6-1 has cleanup criteria for the organochlorine pesticide concentrations in soil samples ranging from 150 (for chlordane) to over 1000 times (e.g. for heptachlor) the EPA Region 6 screening levels and other pesticides listed. This makes it unacceptable for NFA.

SWMU 39 - Building 1092 Oil/Water Separator

SWMU 127 - Building 1092 Waste Oil Tank

SWMU 135 - Building 1092 Oil/Water Separator Drainage Pit

SWMU 170 - Fire Training Area # 1 and JP-4 Tank Area

AOC-T - POL Storage Tank Leaks

These SWMUs 39, 127, 135 and 170 are undergoing bioventing, final confirmatory boring data and soil sampling results will need to be submitted to HRMB for review and approval, before the sites can be considered for NFA.

SWMU 82 - Building 131 Washrack

Using the given scale, the area shown on page 4-3 as SWMU 82 is about 70,000 square feet, and NOT about 1,000 square feet as the text on page 4-2, third paragraph suggests. HRMB will not consider SWMU 82 for NFA since HAFB plans to conduct long-term ground water monitoring. HRMB recommends that the contaminated area be excavated, and not capped.