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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

April 6, 1998

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



**RE: APPROVAL OF TABLE 2 RFI REPORT ON 21 SWMUs AND AREAS OF CONCERN
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) Addendum to the Table 2 RCRA Facility Investigation (RFI) Report for 17 solid waste management units (SWMUs) and 4 areas of concern (AOCs). The HRMB's review incorporated the RFI Report dated December 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 (HWA Module of Permit), RPMP approves the RFI Report for the subject Table 2 SWMUs. 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 petition for NFA and Class 3 Permit Modification for those SWMUs listed in the enclosed Attachment where NFA seems relevant.

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, 98, T₂

ATTACHMENT
EVALUATION OF THE RFI REPORT ON POL-CONTAMINATED SITES

April 6, 1998

Introduction:

The RCRA Permits Management Program (RPMP) of the New Mexico Environment Department has reviewed Holloman Air Force Base (HAFB) December 1997 Addendum to the RCRA Facility Investigation (RFI) Report on the Petroleum, Oil and Lubricant (POL) - contaminated soils for the following twenty-one (21) Table 2 Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs):

- 1) SWMU 3 ✓ - Building 130 Oil/Water Separator
- 2) SWMU 5 ✓ - Building 137 Oil/Water Separator
- 3) SWMU 6 ✓ - Building 193 Oil/Water Separator
- 4) SWMU 8 ✓ - Building 231 Oil/Water Separator
- 5) SWMU 14 ✓ - Building 30-6 Oil/Water Separator
- 6) SWMU 17 ✓ - Building 316 Oil/Water Separator and Waste Oil Tank (WOT)
- 7) SWMU 21 ✓ - Building 316 Oil/Water Separator and WOT
- 8) SWMU 23 ✓ - Building 800 Oil/Water Separator
- 9) SWMU 26 ✓ - Building 809 Oil/Water Separator
- 10) SWMU 28 ✓ - Building 822 Oil/Water Separator
- 11) SWMU 30 ✓ - Building 830 Oil/Water Separator
- 12) SWMU 33 ✓ - Building 869 Oil/Water Separator
- 13) SWMU 107 ✓ - Main Base Electrical Substation
- 14) SWMU 123 ✓ - Building 704 Waste Oil Tank
- 15) SWMU 118 ✓ - Building 21 Pesticide Holding Tank
- 16) SWMU 132 ✓ - Former Building 21 Drainage Pit
- 17) SWMU 141 ✓ - Pad 9 Drainage Pit
- 18) AOC-A ✓ - Former Building 21 Entomology Shop
- 19) AOC-G ✓ - Atlas Electrical Substations
- 20) AOC-P ✓ - Building 301 Fuel Tank Leaks
- 21) AOC-U ✓ - Lost River Basin

Based upon the information that HAFB provided to the New Mexico Environment Department RCRA Permits Management Program, the proposals in the Phase II Addendum for the POL-contaminated soils at the above SWMUs and AOCs have been grouped as follows:

POL-Contaminated Sites Where No Further Action (NFA) Appears Appropriate:

- 1) SWMU 3 - Building 130 Oil/Water Separator
- 2) SWMU 5 - Building 137 Oil/Water Separator
- 3) SWMU 6 - Building 193 Oil/Water Separator
- 4) SWMU 8 - Building 231 Oil/Water Separator
- 5) SWMU 14 - Building 30-6 Oil/Water Separator
- 6) SWMU 17 - Building 316 Oil/Water Separator and Waste Oil Tank (WOT)
- 7) SWMU 21 - Building 316 Oil/Water Separator and WOT
- 8) SWMU 23 - Building 800 Oil/Water Separator
- 9) SWMU 26 - Building 809 Oil/Water Separator
- 10) SWMU 28 - Building 822 Oil/Water Separator
- 11) SWMU 30 - Building 830 Oil/Water Separator
- 12) SWMU 33 - Building 869 Oil/Water Separator
- 13) SWMU 107 - Main Base Electrical Substation
- 14) SWMU 132 - Former Building 21 Drainage Pit
- 15) SWMU 118 - Building 21 Pesticide Holding Tank
- 16) AOC-A - Former Building 21 Entomology Shop
- 17) AOC-G - Atlas Electrical Substations
- 18) AOC-P - Building 301 Fuel Tank Leaks

POL-Contaminated Sites Where Further Investigation is Required:

- 1) SWMU 39 ↙ ↘ Building 1092 Oil/Water Separator
- 2) SWMU 127 - Building 1092 Waste Oil Tank

SWMUs 39, 127 will not be considered for NFA until HAFB has completed the remediation (bioventing) work being done at the sites and has conducted confirmatory drilling, sampling and analysis of the contaminated soils, and submitted the results to HRMB for review.

3) SWMU 123 ✓ - Building 704 Waste Oil Tank

The Addendum to the December 1997 POL Report still shows that there is contamination at SWMU 123 [i.e., 4,100 ppm total recoverable petroleum hydrocarbons (TRPH), and 33 ppm benzene]. The RPMP recommends that HAFB consider either in situ bioremediation or excavation and disposal of the TRPH-contaminated soil. (This was proposed by HAFB in the October 1994 RFI Report, Section 4.4.5, on page 4-30 but has not been implemented in the December 1997 Addendum).

4) SWMU 104 ✓ - Former Army Landfill

Since SWMU 104 is undergoing long term ground water monitoring, HAFB shall continue to monitor the ground water for VOCs, and SVOCs on yearly basis until the sampling data indicate that the concentration of the constituents of concern pose no danger to human health and the environmental media.