



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
2044 A Galisteo Street
Santa Fe, New Mexico 87505
Telephone (505) 827-1567
Fax (505) 827-1544



PETER MAGGIORE
SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

July 17, 2000

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

**SUBJECT: STATEMENT OF BASIS FOR 70 SOLID WASTE MANAGEMENT UNITS:
REQUEST FOR SUPPLEMENTAL INFORMATION
EPA ID No. NM6572124422
Task # HWB-HAFB-00-001**

Dear Mr. Moffitt:

The Hazardous Waste Bureau (**HWB**) of the New Mexico Environment Department (**NMED**) has reviewed for technical completeness the Holloman Air Force Base (**HAFB**) Draft Statement of Basis (**SOB**) for seventy (70) solid waste management units (**SWMUs**) and areas of concern (**AOCs**) that **HWB** recently determined to be appropriate for no further action (**NFA**). The Draft Statement of Basis was dated March 2000.

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, the **HWB** has determined that **SWMU 8** (*Building 231, Oil/Water Separator*), **SWMU 165** (*Building 1176 Pond*), and **AOC-L** (*Early Missile Test Site*) cannot be taken off the list of solid waste management units in **HAFB's** Operating Permit. These **SWMUs** have been replaced with **SWMU 133**(*SD-47 POL Washrack Area*), **SWMU 230**(*Site SS-60, Building 828*), and **SWMU 184**(*Wastewater Recirculating Line*) respectively. **HWB's** comments on the Statement of basis and on **HAFB's** response to the **RSI** of December 1999 are attached to this letter to assist in phrasing the **SOB** for the replacement **SWMUs**.

Mr. Howard Moffitt
Page 2 of 2
July 17, 2000

Please incorporate HAFB's response to the comments and the items in the enclosed attachment into the final version of the statement of Basis, and submit to HWB four hard copies and one 3.5 inch floppy diskette compatible with Microsoft Word or Word Perfect 5.x for subsequent use in promulgating the 45-day public notice, as required by New Mexico Hazardous Waste Management Regulations 20.4.1.NMAC incorporating 40 CFR Part 124.

Please submit the requested information within sixty (60) calendar days from the date you receive this RSI. The HWB may consider a petition for a deadline extension, provided that a written justification and the expected submittal time are given.

If you have any questions regarding this matter, please contact me at (505) 827-1561 x 1030, or at the above address.

Sincerely,



Cornelius Amindyas
Project Leader for Holloman Air Force Base
Hazardous Waste Bureau

Enclosure

cc: James P. Bearzi, Chief, NMED HWB
John E. Kieling, Manager, NMED HWB
Stu Dinwiddie, RCRA Advisor NMED HWB
Stephanie Kruse, NMED HWB
Kirby Olson, NMED HWB
David Neleigh, Chief, EPA Region VI (6PD-N)
Allen Chang, EPA Region VI
John Poland, HAFB
Jose Gallegos, HAFB
FILE: HSWA, HAFB, 00 and Reading

ATTACHMENT 1
REQUEST FOR SUPPLEMENTAL INFORMATION:
HOLLOMAN AIR FORCE BASE STATEMENT OF BASIS FOR 70 SWMUs
July 17, 2000

Please address the following comments and incorporate the responses into the final version of the Statement of Basis for the 70 SWMUs that HWB recently deemed appropriate for NFA:

1) Facility Map:

- a) Re-write the title of the document (Statement of Basis): Approval Of (not ~~For~~) No Further Action for Seventy (70) Solid Waste Management Units.
- b) Include a Site Map (at the beginning of the Statement of Basis) that shows the layout of Holloman Air Force Base as illustrated in Figure B-1, Page B-2, of the July 1997 "Permit Resubmittal Application for the Container Storage Facility".
- c) Incorporate into the Statement of Basis, a Facility map that shows the locations of all the 70 SWMUs and AOCs at HAFB. This map should be a synthesis of *Figure 1-2*, Table 1 SWMUs, which were addressed in the RFI Report dated June 1997 (Volume I); *Figure 1-1*, Page 1-4 of the September 1997 Phase I RCRA Facility Investigation (RFI) Report on Table 2 Solid Waste Management Units; and *Figure 1-1*, Page 1-4, "Location of the Table 3 SWMUs" contained in the Table 3 RFI Report dated October 1997. This map will assist all third party reviewers in understanding where the various SWMUs proposed for NFA are located at Holloman Air Force Base.

- 2) Please re-arrange the text and illustrations of the SWMUs in numerical order, as listed in Table 1 of the draft text of the Statement of Basis. You could use the current Section I of the Table of Contents as an Appendix to Table 1.

3) Table of Contents, Pages vii and viii, "Table of Acronyms":

Replace "Comprehensive Environmental Response Compensation and Liability Act" with Comprehensive Environmental Response Compensation and Liability Act (i.e., include the highlighted punctuation marks). Also, replace "Toxic Characterization Leaching Procedure", with *Toxic Characterization Leaching Procedure*, as presented in the New Mexico Hazardous Waste Management Regulations 20.4.1.200 NMAC incorporating 40 CFR §261.24.

- 4) Complete the first sentence on page 3, third paragraph that reads, "A public meeting was held on 27 January 2000 in Alamogordo, NM, at the location?? Regarding the July 12, 1999 request for permit modification." Please incorporate the location of that meeting into the above gaps/missing highlighted questionable location.

- 5) Add the date of each document in front of the references in **Table 1, Column 6**, and please define the acronyms used in the title, i.e., IRP (in, column 2) and AR/IR (in column 6).
- 6) **SWMU # 8, Building 231 Oil/Water Separator** had total recoverable phase hydrocarbons with contamination ranging from 23,000 mg/kg to 31,000 mg/kg, and it was left in situ, despite the fact that the petroleum-contaminated soil "**extended beneath in-place structure**". NMED recommends that remediation of SWMU # 8 be continued to protect human health.
- 7) Based upon the above reason, SWMU # 8 has been replaced on the list of SWMUs proposed for NFA with SWMU # 133 (*Site SD-47*). HAFB is advised to replace the final statement of Basis for SWMU # 8 with that of SWMU # 133.
- 8) **SWMU #165, Building 1176 Pond**, is still being "used to catch waste from fueling tanks and maintenance equipment for sled tests. The fuels used include unsymmetrical dimethyl hydrazine, aniline, JP-4, inhibited fuming nitric acid, solid rocket propellants..., and solvents such as trichloroethane." Moreover, Phase II Investigations did not analyze for semi-volatile organics as shown by "NA", meaning *not analyzed*, in Table 5.3-1, Section 5 - Phase II Investigation Results, September 1997 RFI Report.

Since SWMU # 165 is still active, it has been replaced with SWMU # 230 (*Site SS-60*) following review of HAFB's response to HWB's recent request for supplemental information on the latter site. Please incorporate the statement of Basis for SWMU # 230 into the final document/Statement of Basis in lieu of SWMU # 165.
- 9) **AOC-L, Early Missile Test Site**: the report about the investigation of this site states that "petroleum hydrocarbons were detected in samples from all the transformer locations at concentrations ranging from 21.6 mg/kg to 30,6000 mg/kg". NMED recommends that HAFB replace the Statement of Basis of *AOC-L* in the final text with that of SWMU # 184 (*Wastewater Re-Circulating Line*), which was remediated with the recently closed Sewage Lagoons. Further investigation is needed before NMED can make a final determination on the site for no further action.

ATTACHMENT 2:

HAZARDOUS WASTE BUREAU'S COMMENTS ON HAFB'S RESPONSE TO THE REQUEST FOR SUPPLEMENTAL INFORMATION DATED DECEMBER 1999.

HWB has reviewed the Addendum to the Final Characterization Summary and No Further Action Documentation Report for SWMUs 133, 230, and AOC-T. The NFA request for AOC-T has been withdrawn because additional contamination has been found at the site, so that site isn't considered here.

Holloman Air Force Base may use the following comments in phrasing the Statement of Basis for SWMUs 133 and 130:

The levels of BTEX and MTBE at SWMU 133 are below the detection limit in the confirmatory sampling of the subsurface soils. The detection limits for this sampling were 0.005 mg/kg for benzene, toluene and ethylbenzene, 0.035 mg/kg for MTBE, and 0.015 mg/kg for xylene. These detection limits are below the EPA Region 6 Human Health Medium-Specific Screening Levels, so any residual contamination that may exist at levels below the detection limit at SWMU 133 does not represent an excess risk to human health. Confirmatory samples showed TPH concentrations at this site were below the detection limit (detection limit equals 10 mg/kg) at one portion of the site, with two detections < 100 mg/kg at another portion of the site. Since these levels meet the OCD guidelines and are found 8-9 ft down in the soil, they do not represent an excess risk to human health at this SWMU.

At SWMU 230 the confirmatory samples had the same detection limits mentioned above, and both surface samples showed nondetect results for all contaminants. Subsurface confirmatory samples were not taken at this site, which in 1997 had shown TPH > 100 mg/kg at 8-9 ft. The contamination at this site existed primarily at approximately 9 feet below ground surface, which is probably where the confirmatory samples should have been taken. The effluent from the SVE system doesn't show any more residual contamination leaving the site through the SVE system, but this doesn't guarantee that all subsurface soil is clean. Provided that the subsurface soil is not exposed (for example, through construction), the potential residual subsurface soil contamination at this site should not present an excess risk to human health.

Due to the nature of the sites as well as the location and levels of contamination, HWB feels that ecological risk from residual contamination should not be a problem at this site.