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GOVERNOR

*State of New Mexico*  
**ENVIRONMENT DEPARTMENT**

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**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

January 17, 2001

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

**RE: REVIEW OF THE FINAL LONG-TERM GROUNDWATER  
MONITORING REPORT, JUNE 2000.  
HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422-2  
TASK NUMBER: HWB-HAFB 00-004**

Dear Mr. Moffitt:

The Hazardous Waste Bureau (**HWB**) of the New Mexico Environment Department (**NMED**) has reviewed the Final Long-Term Groundwater Monitoring Report that Holloman Air Force Base (**HAFB**) submitted to the HWB on September 6, 2000. Following review of the above referenced document, HWB has made a determination that additional information is required prior to granting approval for No further action (**NFA**).

HAFB should therefore continue to monitor the subject groundwater wells at the current frequency as per HAFB 1988 HSWA Permit, Permit Condition L (*Determination of No Further Action*), Item 2; Page 18, which states that "A determination of NFA shall not preclude the Administrative Authority from requiring continued periodic monitoring of...groundwater..., when site specific circumstances indicate that release of hazardous waste constituents are likely to occur, if necessary to protect human health and the environment", as required by 20.4.1.500 NMAC, incorporating 40 CFR § 264.99.

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Please address the following comments.

- 1) NMED recommends that sample analysis values be reported as a less than instrument detection limit, versus a non-detect (ND) reporting.
- 2) Page 3-7, Table 3-3; NMED recommends continuing the LF-01 sampling program for all contaminants listed in the Table.
- 3) Page 3-11, Table 3-5; NMED recommends continuing the LF-10 sampling program for the listed VOC's and metals. NMED approves of the discontinuance of sampling for organochlorine pesticides.
- 4) Page 3-15, Table 3-7; NMED recommends continuing the SD-08 sampling program for all contaminants listed in the Table.
- 5) Page 3-20, Table 3-9; NMED recommends continuing the LF-19 sampling program for all VOC's, metals, and organochlorine pesticides listed in the Table. Consideration should also be given to investigating the LF-19 site in an attempt to determine the cause of the manganese detected in monitoring well MW-19-01.
- 6) Page 3-24, Table 3-11; NMED recommends continuing the LF-21 sampling program for VOC's, and metals listed in the Table. NMED approves of the discontinuance of sampling for chlorinated herbicides and organochlorine pesticides. NMED strongly advises HAFB to continue investigating the LF-21 site in an attempt to determine the cause of the TCE's detected in monitoring well MW-21-01.
- 7) Page 3-28, Table 3-13; NMED recommends continuing the LF-22 sampling program for VOC's, all metals, and chlorinated herbicides listed in the Table. NMED approves of the discontinuance of sampling for polychlorinated biphenyls and organochlorine pesticides. However, HAFB should continue investigating the LF-22 site in an attempt to determine the cause of the chlorinated herbicides (MCPP and Pichloram) and manganese detected in monitoring well MW-22-01.
- 8) Page 3-32, Table 3-15; NMED recommends continuing the LF-23 sampling program for VOC's, all metals, organochlorine pesticides and chlorinated herbicides listed in the Table. NMED approves of the discontinuance of sampling for polychlorinated biphenyls, however, consideration should be given into investigating the LF-23 site in an attempt to determine the cause of the iron, 4-nitrophenol, and manganese detected in monitoring well MW-23-01.

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- 9) Page 3-42, Table 3-21; NMED recommends continuing the DP-30 and SD-33 sampling program for VOC's and all metals listed in the Table and submission of the data to NMED for review.
- 10) Page 3-55, Paragraph 3.14.3; NMED concurs with the recommendation that additional samples be collected at 118-MW1601 to confirm detections of TCE and chloroform.
- 11) Page 3-60, Table 3-31; HAFB should investigate possible scenarios to control the migration of the 1,2-dichloroethane and benzene detected in groundwater samples from MW-BX-01.
- 12) Page 3-67, Table 3-35; NMED recommends that HAFB continue the LF-29 sampling program for VOC's and SVOC's listed in the Table. NMED concurs with the recommendation that TOC elevations of LF-29 associated monitoring wells be re-surveyed.

If you have any questions please contact Robert Warder or me at the address above or by telephone at (505) 827-1557 x 1052 and (505) 827-1557 x 1030 respectively.

Sincerely,



Cornelius A. Amindyas  
Project Leader  
Holloman Air Force Base

CAA/rw

cc: James P. Bearzi, Chief, NMED HWB  
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