



DEPARTMENT OF THE AIR FORCE

HEADQUARTERS 49TH FIGHTER WING (ACC)
HOLLOMAN AIR FORCE BASE, NEW MEXICO

NM
0392

MEMORANDUM FOR NEW MEXICO ENVIRONMENT DEPARTMENT

Dr. Robert S. (Stu) Dinwiddie
Hazardous Waste Bureau
P.O. Box 26110
Santa Fe NM 87502-6110

28 MAR 2001

FROM: 49 CES/CEV
550 Tabosa Avenue
Holloman AFB NM 88330-8458

SUBJECT: 2000 Annual Unit Audit (AUA) Draft Response

1. In response to the Hazardous Waste Bureau letter dated 28 Feb 01, we submit the following comments concerning the Draft 2000 AUA for Holloman AFB (HAFB).
2. On page 2 of the Draft AUA, ten (10) operating units are listed including HAFB's 7 sewage lagoons. As in the final 1999 AUA invoice, we propose that the lagoons be counted as one (1) contiguous operating unit, and thus, one fee assessed. In the final 1999 AUA invoice, the lagoons were listed as a "Land Disposal" unit and assessed a \$2,000 fee accordingly. In that year, the lagoons were also listed on Table A.2 as Solid Waste Management Units (SWMUs) 148 to 154. We feel this is appropriate for tracking purposes. As in the final 1999 AUA, we ask that these SWMUs continue to be listed on Table A.2 with appropriate comment inserted clarifying their status, i.e., closure was pending during calendar year 2000.
3. Also, on the same page, the 300 Pound Open Burn Unit is listed and assessed a \$1,500 fee. This unit is also listed as SWMU 172 on Table A.1 and assessed an additional fee of \$250. We feel this is a double charge for the same unit. The unit is in the much the same scenario as the sewage lagoons, i.e., it is appropriate to be listed as an operating unit and assessed a fee as such, however, SWMU 172 should be listed on Table A.2 with an appropriate clarifying comment. The result would avoid the "double charge" and would be representing the unit's status much more clearly and be consistent with the way the sewage lagoons' status is handled.
4. With the exception of SWMU 172, we concur with the draft's Table A.1 listing of SWMUs. Therefore, Table A.1 consists of 107 SWMUs excluding SWMU 172.
5. However, we have some concern over the listing of "Non-Billable AOCs" on Table A.1. Twenty-three (23) units were included on this table for 2000. The following 8 AOCs were listed on Table A.1 of Holloman's 1998 and 1999 AUA and do not present a concern. They include AOC-A, D, G, L, P, T, U, and V. The following 7 units were listed in previous years (i.e., 1998 and 1999 AUA) but on Table A.2. They include AOC-B, C, E, F, M, PRI-2, and PRI-5. Finally,

the following 8 units appeared on Table A.2 of the 1998 AUA **but were excluded** altogether from the 1999 AUA. These units include AOC-H, I, J, K, N, Q, R, and S. Therefore, in our opinion, the latter 15 units listed here are questionable and present a concern.

6. Our concern is that all of the “non-billable” units added to Table A.1 in the draft 2000 AUA were subjects discussed and, seemingly, settled during the past two years during the 1998 and 1999 AUA discussions. Despite those efforts, these units continue to be subjects of debate. To settle the status of the 15 questionable units, we propose the following:

- First, we have attached, for your review, copies of existing Decision Documents for six (6) of the 15 units including AOC-H, J, K, N, R, and S. We hope these documents will clarify the units’ status and, thus, result in these units being placed on Table A.2.
- Secondly, for the remaining 9 units under question (AOC-B, C, E, F, I, M, Q, PRI-2, and PRI-5), we ask that they be placed on Table A.2 and Holloman be given 60 days to research their status and provide appropriate documentation. This timeframe will allow us to thoroughly review our records and ensure that proper documentation is provided.
- The resulting Table A.1 would then consist of **115 total units including 107 SWMUs and 8 AOCs.**

7. And, finally, after reviewing Table A.2 and keeping in mind that this table is for tracking purposes only, we submit the following:

- Twenty-six units (26) have been excluded in the 2000 draft although they were on Table A.2 of the 1999 AUA. They include SWMU 213 - 228, PRI-1, PRI-3, PRI-4, and the previously discussed sewage lagoons (SWMUs 148 – 154). For the sake of tracking and consistency, we feel these units should remain on Table A.2, with appropriate comment, for tracking purposes.
- The 15 questionable “non-billable” units previously discussed should be included in Table A.2
- The resulting Table A.2 would then consist of **143 total units including 125 SWMUs, 13 AOCs, and 5 PRI units.**

8. We feel that the previous assessment of the draft 2000 AUA is a fair and an accurate reflection of Holloman's corrective action units. We look forward to working with your office and hope for a quick settlement of our aforementioned concerns. If you have any questions or require additional information, please contact Mr. Jose Gallegos at 572-5395.


JOHN R. POLAND, REM
Chief, Environmental Flight

Attachment:

Decision Documents for AOC-H, J, K, N, R, and S (six separate documents, printed on front and back).

cc (w/attachment):

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cc (w/o attachment):

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