

HAFB 01



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**ENVIRONMENT DEPARTMENT**

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File in reading room  
3-29-01

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

March 29, 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 PHASE II REMEDIAL INVESTIGATION  
REPORT FOR SS-61 – SPILL SITE 61, DECEMBER 2000.  
HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422-2  
TASK NUMBER: HWB-HAFB 01-002**

Dear Mr. Moffitt:

The Hazardous Waste Bureau (HWB) of the New Mexico Environment Department (NMED) has reviewed the Final Phase II Remedial Investigation Report for SS-61 that Holloman Air Force Base (HAFB) submitted to the HWB on January 22, 2001. 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) Per the NMED Position Paper dated 29 December 2000, the remediation action level for contaminated soils with a depth to groundwater less than 50 feet, is 100 ppm TRPH and 10 ppm benzene. On page 4-2, the first bullet states that a base-wide soil cleanup standard of 1,000 mg/kg is applicable to underground storage tank (UST) sites, of which there appear to be none at SS-61. This UST standard is also applicable only if there are no detected RCRA hazardous constituents present, of which benzene, toluene, and methylene chloride are present.
- 2) Page 4-2, Paragraph 1; an ecological receptor may be affected since the nearest production well is 3.5 miles downgradient which is used for livestock (Page 3-6).
- 3) Monitoring wells defining contaminant plumes must be sampled annually.
- 4) Page 4-3; HAFB states that NMED UST and RCRA Permits Program closure and corrective action requirements should not be applicable to the site. In reference to comment 3 above, the TRPH limit of 1,000 mg/kg used by HAFB is that of a UST site.
- 5) One soil sample exceeded HAFB's standard for benzene (25 mg/kg). The value was 29.4 mg/kg (DP22). NMED recommends additional sampling for RCRA constituents in the vicinity of the concrete pad per EPA Methods 8260 and 8270.
- 6) NMED recommends sampling for TDS within the extent of the contaminant plume to verify that TDS values are greater than 10,000 mg/L. NMED suggests that TDS samples be taken at MW-29-02, MW-03, MW-10 and MW-05. If samples have been taken and analyzed for TDS previously, those results may be submitted in lieu of additional sampling.
- 7) NMED requests that HAFB confirm that contamination from SS-61 has not migrated into groundwater containing less than 10,000 mg/L TDS. Specifically, groundwater to the west of HAFB.
- 8) NMED requests that HAFB submit data indicating the amount and thickness of free product present at SS-61, if any.
- 9) NMED suggests running the EPA modeling program BIOSCREEN and submitting the data to NMED. This program is available free from the EPA website and will model petroleum spill plume migration.
- 10) Discrepancies appear to have occurred between the Draft Final Phase I and Phase II RCRA Facility Investigation Report and this report concerning sample points and results. Specifically, Figure 2-4 of the RFI report and Figure 5-1 of the RI report. Please explain the differences.
- 11) The Phase I and Phase II RFI report mentions DP-09. There is no mention of a DP-09 in the Final RI report. Where was this sample point located?

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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,



*for* Cornelius A. Amindyas  
Project Leader  
Holloman Air Force Base

CAA/rw

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