May 09, 2001

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

HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422-2
HWB-HAFB 00-003

Dear Mr. Moffitt:

The Hazardous Waste Bureau (HWB) of the New Mexico Environment Department (NMED) is submitting a revised comment letter to Holloman Air Force Base (HAFB) concerning the Final Long-Term Groundwater Monitoring Report that HAFB submitted to the HWB on September 6, 2000. This letter reflects changes to the original NMED comment letter to HAFB dated January 17, 2001, based upon phone conversations with HAFB and Foster Wheeler Environmental Corporation.

NMED hereby approves of the 1999 LTM Report as submitted. Please incorporate the following comments into the 2001 LTM Report and sampling event.

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 Arsenic, Barium, Manganese, and Selenium. NMED approves of discontinuing sampling for VOCs and Organochlorine Pesticides.
3) Page 3-11, Table 3-5; NMED recommends continuing the LF-10 sampling program for Arsenic, Barium, Chromium, Lead, Manganese, and Selenium. NMED approves of the discontinuance of sampling for VOCs and organochlorine pesticides.

4) Page 3-15, Table 3-7; NMED recommends continuing the SD-08 sampling program for 1,2-Dichloroethane, Arsenic, Barium, Lead, Iron, and Manganese.

5) Page 3-20, Table 3-9; NMED recommends continuing the LF-19 sampling program for Barium, Iron, Lead, Manganese and Mercury. Consideration should be given to investigating the LF-19 site in an attempt to determine the source 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 TCE, Arsenic, Barium, Iron, Manganese, and Selenium. NMED advises HAFB to continue investigating the LF-21 site in an attempt to determine the cause of the TCE contamination detected in upgradient monitoring well MW-21-01.

7) Page 3-28, Table 3-13; NMED recommends continuing the LF-22 sampling program for Arsenic, Barium, Iron, Manganese, Selenium, and chlorinated herbicides listed in the table. NMED approves of the discontinuance of sampling for VOCs, polychlorinated biphenyls and organochlorine pesticides. NMED recommends that HAFB continue investigating the LF-22 site in an attempt to determine the cause of the chlorinated herbicides (MCPP and Pichloram) and Manganese detected in upgradient monitoring well MW-22-01.

8) Page 3-32, Table 3-15; NMED recommends continuing the LF-23 sampling program for Barium, Iron, Manganese, Selenium, and chlorinated herbicides. NMED approves of the discontinuance of sampling for VOCs, organochlorine pesticides, and polychlorinated biphenyls. 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 upgradient monitoring well MW-23-01.

9) Page 3-35, Table 3-17; NMED approves of no changes to the LTM Program for OT-44.

10) Page 3-38, Table 3-19; NMED approves of the discontinuance of sampling for Lead at SS-48.

11) Page 3-42, Table 3-21; NMED recommends continuing the DP-30/SD-33 sampling program for VOCs, Arsenic, Barium, Iron, and Selenium.

12) Page 3-45, Table 3-23; NMED approves of no changes to the LTM Program for SS-56.

13) Page 3-49, Table 3-25; NMED approves of no changes to the LTM Program for SS-02/SS-05.

14) Page 3-52, Table 3-27; NMED approves of no changes to the LTM Program for SS-46.

15) Page 3-55, Paragraph 3.14.3; NMED recommends continuing the OT-16 sampling program for VOCs and Lindane in 118-MW1602.

16) Page 3-60, Table 3-31; NMED approves of no changes to the LTM Program for SS-17. HAFB should investigate possible scenarios to control the migration of the 1,2-Dichloroethane and Benzene detected in groundwater samples from MW-BX-01.

17) Page 3-64, Table 3-33; NMED approves of no changes to the LTM Program for SS-39.
18) Page 3-67, Table 3-35; NMED recommends that HAFB continue the LF-29 sampling program for VOCs. NMED approves of the discontinuance of sampling for SVOCs.

NMED concurs with the recommendation that TOC elevations of LF-29 associated monitoring wells be re-surveyed.

If you have any questions please contact me or Robert Warder at the address above or by telephone at (505) 841-9033.

Sincerely,

[Signature]

Cornelius A. Amindfas
Project Leader
Holloman Air Force Base

CAA/rw

cc: James P. Bearzi, NMED HWB
    John E. Keiling, NMED HWB
    Robert S. Dinwiddie, NMED HWB
    Robert Warder, NMED HWB
    Pam Allen, NMED HWB
    Allen Chang, EPA Region 6 (6PD-N)
    Court Fesmire, HAFB
    John Poland, HAFB

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