

RED HAFB 101



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ENVIRONMENT DEPARTMENT

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

July 20, 2001

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

**RE: REVIEW OF PRELIMINARY ASSESSMENT/SITE INSPECTION REPORT
FOR AOC-RITAS DRAW, HOLLOMAN AIR FORCE BASE,
EPA ID # NM6572124422-2
TASK NUMBER: HWB-HAFB 00-005**

Dear Mr. Moffitt:

Pursuant to its authority under the New Mexico Hazardous Waste Act, N.M.S.A. 74-4-1 et seq., and the New Mexico Hazardous Waste Management Regulations 20.4.1.NMAC, the Hazardous Waste Bureau (HWB) of the New Mexico Environment Department (NMED) has reviewed the preliminary assessment/site inspection report for AOC-Ritas Draw that Holloman Air Force Base (HAFB) previously submitted to HWB.

Following review of the above referenced document, HWB has made a determination that additional information is required prior to making a final determination for No further action (NFA). The enclosed attachment lists the issues HAFB should address and the additional information that HAFB should provide to NMED before a final determination can be made.

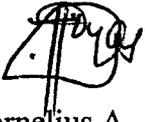
Please submit the requested information within sixty (60) calendar days from the date you receive this RSI. The HWB may consider a petition for a deadline extension, provided that a written justification and the expected submittal time are given.

Mr. Moffitt, HAFB
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Please present the required information in two hard copies and on a 3.5" diskette compatible with Microsoft Word.

If you have any questions please contact Steve Jetter, at (505) 841-9488 or Julie Jacobs at (505) 827-2776, or at the above address.

Sincerely,



Cornelius A. Amindyas
Project Leader
Holloman Air Force Base

CAA

cc: James P. Bearzi, Chief, NMED HWB
John E. Keiling, NMED HWB
Will Moats, NMED HWB
Glenn von Gonten, NMED HWB
Julie Jacobs, NMED GWQB/HWB
Steve Jetter, NMED HWB
David Neleigh, EPA Region VI (6PD-N)
John Poland, HAFB
Jose Gallegos, HAFB
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ATTACHMENT
HAZARDOUS WASTE BUREAU'S COMMENTS ON THE
PRELIMINARY ASSESSMENT/SITE INSPECTION REPORT FOR AOC-RITAS
DRAW, HOLLOMAN AIR FORCE BASE (HAFB), NEW MEXICO

The New Mexico Environment Department's Hazardous Waste Bureau has reviewed the above referenced report and has the following comments and concerns regarding the investigation and information provided in the report.

1. The report is lacking in the general description of the site. A discussion of, or maps/photos showing the amount of topographic relief present at the site is required in order to evaluate the appropriateness of the sampling locations.
2. Section 2.1 states that there are two partially buried drums at the site. Section 3.1 states that several drums and the geophysical survey report indicate there are seven partially buried drums at the site. The report should provide details on the condition and contents of the drums. Also, explain the discrepancy in the last two sentences on the number of drums at the subject site.
3. Address the concerns presented in the following four paragraphs regarding the locations of the DPT sampling points as depicted in Figure 1-3.
 - a. RITA-1 is located at the head of the drainage up gradient of Disturbed Area 1 and Drum 7 and therefore is not representative of potential contaminants that may emanate from this location.
 - b. RITA-2 appears to be located cross gradient and outside of the drainage area associated with Disturbed Area 2. In order to identify contaminants released from Area 2, the samples should have been collected from the drainage channel directly downgradient of Area 2.
 - c. RITA-3 appears to be located on elevated ground between two drainages based on the site map. Without a discussion or photos on the amount of relief between these two drainages it appears that the sampling depth (0 to 2 feet below ground surface) is inadequate for determining contaminant migrating in the drainage bottoms.
 - d. There were no samples collected near drums 1, 2, 3 or 4.
4. NMED recommends that additional soil samples be collected during the planned removal of the drums. These samples should be collected at the potential source areas (i.e. drums) or in the drainage bottoms immediately downgradient from the source, and the analytical results submitted to NMED.
5. Page 6, Section 4.3, 1st paragraph states that "Groundwater at Holloman AFB exceeds 10,000 mg/L total dissolved solids (TDS) and is not used as a potable, irrigation, or production well water supply." Holloman cannot use a blanket statement regarding groundwater with greater than 10,000 mg/L total dissolved solids (TDS). Site-specific samples must be collected in order to determine TDS values at the site.

6. Page 7, regarding Base-wide (background) UTL concentrations. Please reference the report used to establish the Base-wide UTLs.
7. Section 4.3 regarding Risk-Based Screening Levels. NMED requires that analysis of risk and risk-based screening levels be performed using the residential screening levels.
8. An Eco risk assessment must be performed.
9. The Report contains no information on how background levels were determined. Please explain.
10. The areas pointed out in the Report as “anomalies” must be investigated, and addressed.