

Review Recommendations
Final Closure Report for SWMUs 39, 127 and 135 - ERP Site FT-31
Holloman Air Force Base (HAFB), New Mexico

Site Specific Comments:

1. Page 1-7, 1st paragraph:
This paragraph seems to be a continuation of the last paragraph in the previous page, but some sentences were missing. Please revise it.
2. Page 2-2, Section 2.2:
It states, "The soil samples were collected and analyzed according to Section 2.4 (Sampling and Analysis) of the FSAP (EBASCO, 1995a), and the Closure Report for Phase II remediation of POL-Contaminated Sites (Foster Wheeler Environmental 1997)." Have those two documents been approved by NMED HWB?
3. Page 2-1, 3rd paragraph:
It states, "The remaining clean soil excavated at this site, containing TPH less than 1,000 mg/kg, was used as excavation backfill." The less TPH contaminated soil can be used as backfill to elsewhere but not for this site. It does not make sense by removing heavily contaminated soil and then backfilling with lesser contaminated soil while the shallow groundwater table is still contaminated with TPH. Please explain.
4. Page 2-2, Section 2.2.1:
It states, "No samples were collected from the bottom of the excavation because the excavation extended below the water table." What is the TPH concentrations at this level (27 feet below ground surface)? If the biodegradation rate is slow at this site, TPH in the groundwater will not degrade soon and could re-contaminate the backfilled soils from the bottom and eventually move upward.
5. Page 2-2, 4th paragraph, Subsection 2.2.2:
HAFB should explain in the Report how the contaminated soils were distributed to ten soil stockpiles and how the representative samples (one from each soil stockpile) are collected. Are they grab samples or composite samples and how were they composited?