

HAFB 2002



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

JUL 9 2002



Mr. James Bearzi, Chief
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

**RE: Review of the Final Closure Report for SWMU 136 - Building
1119 Washrack Drainage Pit, Holloman AFB, New Mexico
EPA ID No. NM6572124422**

Dear Mr. Bearzi:

The Environmental Protection Agency (EPA) received a technical document titled "Holloman Air Force Base (HAFB) Final Closure Report for SWMU 136 - Building 1119 Washrack Drainage Pit" dated October 11, 2001. EPA has reviewed the Report and has determined that parts of the report are technically deficient. Enclosed is a list of Review Recommendations for your attention.

The Report documented the remediation activities of the subsurface soil contaminated with petroleum, oil and lubricants (POL) at SWMU 136. The purpose of remediation is to support No Further Action determination. If you have any questions or need additional information, please contact Allen T. Chang of my staff at (214) 665-7541.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Laurie King".

Laurie King, Chief
New Mexico and Federal Facilities
Section

Enclosed

cc. Mr. Cornelius Amindyas

Review Recommendations
Final Closure Report for SWMU 136 - Building 1119
Washrack Drainage Pit
Holloman Air Force Base (HAFB), New Mexico

Site Specific Comments:

1. Page 2-3, 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)." Since the cited documents are not attached with the Report, it is impossible to review and comment. Have those two documents been approved by NMED HWB?

2. Page 2-7, 1st paragraph:
It states, "The remaining clean soil, containing TPH less than 1,000 mg/kg (approximately 20 c.y.), was used as excavation backfill." The less TPH contaminated soil can be used as backfill to elsewhere but not for TPH site. It does not make much sense by removing heavily contaminated soil and then backfilling with lesser contaminated soil while the shallow groundwater table is also contaminated with TPH. Please explain.

3. Page 2-2, 4th paragraph, Subsection 2.2.2:
HAFB should explain in the Report how the contaminated soils were distributed to four soil stockpiles and how the representative samples (one from each soil stockpile) are collected. What kind the samples (grab samples vs composite samples) were taken from each stockpile? If they are composite samples, HAFB should explain how many grab samples were composited to a final sample?