

HAF B 2002



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State of New Mexico  
**ENVIRONMENT DEPARTMENT**

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JOHN D'ANTONIO, Jr.  
SECRETARY

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

October 1, 2002

Howard Moffitt  
Deputy Base Civil Engineer  
49 CES/CEV  
550 Tabosa Ave.  
Holloman AFB, NM 88330-2733

**RE: REQUEST FOR SUPPLEMENTAL INFORMATION ON  
ERP SITE FT-31, SOLID WASTE MANAGEMENT UNITS 39, 127 and 135  
HOLLOMAN AIR FORCE BASE  
EPA ID NO. NM6572124422  
HWB-HAFB-02-004**

Dear Mr. Moffitt:

The New Mexico Environment Department (NMED) Hazardous Waste Bureau has reviewed Holloman Air Force Base's Final Closure Report for SMWUs 39, 127, and 135 – ERP Site FT-31 dated March 2002.

Enclosed is a Request for Supplemental Information (RSI), which lists the deficiencies that must be addressed before a final determination can be made. Please submit the requested information within sixty (60) calendar days from receipt of this RSI. Failure to respond within this time period may result in the issuance of a Notice of Deficiency. NMED may consider a petition for an extension, provided that written justification and the expected submittal date are provided.

Mr. Moffitt  
October 1, 2002  
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If you have any questions or need additional information, please contact Steve Jetter at (505) 841-9488.

Sincerely,



Cornelius Amindyas  
Project Leader for HAFB  
Hazardous Waste Bureau

CAA: sj

Attachment

cc: James P. Bearzi, Chief, NMED HWB  
Will Moats, NMED HWB  
Steve Jetter, NMED HWB  
Laurie King, EPA Region VI (6PD-N)  
Allen Chang, EPA Region VI (6PD-N)  
John Poland, HAFB  
Dan Holmquist, HAFB

file: HAFB Red 02 and Reading

**ATTACHMENT A**  
**HAZARDOUS WASTE BUREAU'S COMMENTS ON THE FT-31 CLOSURE REPORT**  
**FOR SWMUs 39, 127 AND 135, HOLLOWAN AIR FORCE BASE (HAFB), NEW**  
**MEXICO**

The New Mexico Environment Department has reviewed the above referenced report and has the following comments and concerns regarding the information provided in the report.

**General Comments:**

1. The number of laboratory confirmation samples is inadequate for the size of the excavation. It appears that the confirmation soil samples were taken from discrete locations within the excavation pit, i.e. mid-point along each wall. Collection of one sample from a sidewall sixty feet long is insufficient for determining whether or not the objectives of the proposed work were met. The sampling locations should be biased to areas of greatest contamination based on field analytical or field screening results.
2. Provide the on-site analytical testing and field screening results along with a site diagram showing where the field screening results were collected. Although this information will not be used as a regulatory driver, the information is useful in determining whether the objectives of the work were met and where confirmatory sampling should be collected.
3. Provide the criteria used for determining where and when the objectives of the excavation work were accomplished. That is, how was it determined when to stop excavating and where the confirmatory samples would be collected?

**Specific Comments:**

1. Page 1-7, 1<sup>st</sup> paragraph: The first sentence is a fragment and appears to be disjointed from the last sentence on the previous page. Please correct.
2. Page 2-1, Section 2.1: This section states, "The final excavation was approximately 70 ft by 80 ft with a total depth of 27 ft. Approximately 1,000 cubic yards of soil removed, stockpiled, and sampled." The total soil removed from the excavation does not correspond with the dimensions of the excavation based on the dimensions given in the text and shown in Figure 2-1. Based on the pit dimensions, between 3500 and 5600 cubic yards of soil were removed. Please clarify the discrepancy in these volumes.
3. Discuss how the excavated material was segregated during the excavation to ensure that soil over 1000 milligrams/kilogram was not returned to the excavation as backfill.
4. Table 2-1: The analytical results for samples FT31CS-5-4 East Wall and FT31CS-5-16 East Wall are transposed.
5. Table 2-2 : Xylene was detected at 1.7 mg/kg in Sample FT-31-SP01 but not included in the table results.

Attachment A  
FT-31 Closure Report Comments  
Page 2 of 2

6. Figure 2-1: Include preexisting reference points, such as the fence line and existing monitoring wells, on the site diagram in order to accurately indicate where the excavation pit is in relation to known sampling locations.
  
7. Appendix E : The vast majority of the investigation material provided in this appendix does not pertain to SWMUs 39, 127 and 135. Please provide the pertinent information associated with the investigation of this area. Include boring logs and sampling results for monitoring wells, MW-07, 08 and 09, and soil borings 127-B01 and B02 that were apparently installed as part of the 1989 RI (Walk, Haydel and Associates). Additional investigation information also appeared in the 1997 Table 2 RFI Report.