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:


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

Sincerely,

[Signature]

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, HOLLOMAN 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, 1st 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.
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.