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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

April 9, 2003

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

**RE: FEE ASSESSMENT AND APPROVAL OF THE RCRA VOLUNTARY
CORRECTIVE MEASURES WORKPLAN FOR PETROLEUM
CONTAMINATED SOIL EXCAVATION AT SS-17, FT-31 AND WEST POL
YARD, HOLLoman AIR FORCE BASE
EPA ID# NM6572124422
HWB-HAFB-02-006**

Dear Mr. Moffitt:

The New Mexico Environment Department (NMED) Hazardous Waste Bureau (HWB) has received Holloman Air Force Base's (HAFB) Revised Final Letter Work Plan for Petroleum-Contaminated Soil Excavation at SS-17, FT-31 and the West POL Yard dated January 2003.

HWB has reviewed and approves the implementation of the work plan with the following changes and conditions:

1. Section 3.1, page 9 - There is a conflict between the text and Table 3-1 regarding the sample containers used. NMED requests that the Encore samplers be used to collect the laboratory samples for VOC analysis.
2. Section 3.2, page 9, 1st paragraph - Incorrectly states that stockpile samples will be collected at a frequency of one per 100 cubic yards (c.y.) for soil disposed of offsite.

- a) Contaminated soil disposed of at an offsite permitted facility does not need to be sampled at the 1/100 c.y. frequency. The number of samples required for disposal of this soil shall be determined by the disposal facility.
 - b) Only suspected contaminated soil (>100 ppm and <940 ppm TPH) intended for use as backfill requires sampling at the 1 sample per 100 c.y. frequency. The laboratory analytical methods for this soil shall include VOCs (SW-846 Method 5035/8260B), SVOCs (SW-846 Method 8270), and TPH (GRO, DRO, ORO – as applicable) (EPA Method 8015B modified).
3. NMED had requested additional background data and information used to determine areas of the sites requiring excavation be included in the work plan in order for NMED to concur that the proposed excavation locations would meet the work plan objectives. The work plan at a minimum should have included figures showing data for the most recent hydrocarbon concentrations in soil and ground water. NMED received this information for the FT-31 site and has the most recent investigation sampling report for the West POL site. However, this information has not been provided for the BX Service Station (SS-17 site).

Approval of this work plan does not guarantee NMED approval of closure at these sites following completion of the outlined work. NMED does anticipate that execution of this work plan will likely complete the requirements needed to close or complete a risk-based closure at the sites if the soil excavations achieve the remediation goals stated in the work plan. However, NMED will need to review all site records and data and ensure that no other unresolved issues are present at the sites prior to making a no further action determination.

The New Mexico Hazardous Waste Management Fee Regulations 20.4.2 NMAC require assessment of fees for NMED's review of this document. This work plan will be invoiced as a voluntary corrective measures work plan for the three sites. The fee assessment invoice will be sent to you under separate cover. Payment is due within sixty (60) days from the date you receive the invoice.

If fees are transmitted electronically, you must submit a letter to Cindy Abeyta, Hazardous Waste Bureau, indicating the invoice number, payment amount, date of payment and the assessed activity.

Howard Moffitt
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If you have any questions, please contact Steve Jetter or me at (505) 841-9488.

Sincerely,



Cornelius Amindyas
HAFB Project Leader
HWB Permits Management Program

CAA:sj

cc: James Bearzi, NMED HWB
John Kieling, NMED HWB
Steve Jetter, NMED HWB
Cindy Abeyta, NMED HWB
Allen Chang, EPA-Region 6
Deborah Hartell, HAFB
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