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HAFB 0004



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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

August 10, 2004

Ms. Deborah Hartell
Chief
Environmental Flight
49 CES/CD
550 Tabosa Avenue
Holloman Air Force Base, NM 88330-8458

SUBJECT: HAFB LETTER OF MAY 21, 2004, REGARDING CHARACTERIZATION REQUIREMENTS FOR SEVEN SOLID WASTE MANAGEMENT UNITS HOLLOMAN AIR FORCE BASE NM6572124422 HBW-HAFB-04-022

Dear Ms. Hartell:

The New Mexico Environment Department (NMED) has received the subject letter which concerns additional characterization work needed for Solid Waste Management Units (SWMUs) 105 (LF-19 Golf Course Landfill), 108 (LF-23 MOBSS Landfill Disposal Trench), 101/109 (LF-10 Old Main Base Landfill), 115 (LF-22 West Area Landfill # 1: PCB Disposal Area), 116 (LF-21 West Area Landfill # 2), and 113B (DP-30/SD-33 Sludge Disposal Trenches/Fire Training Area). The NMED is in agreement with most, but not all of the proposed work. Based on our review of this letter, the NMED has the following comments and requirements. Some of the requirements are based on decisions made by the NMED since the April 4, 2004, visit to HAFB.

1. NMED staff did not agree to the assertion that no response from the NMED constitutes concurrence with the proposed scope of work. NMED staff did agree in the meeting to respond to the subject letter after its receipt by the Department. This letter is NMED's response.

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2. NMED will be reviewing in detail the LTM ground-water monitoring data for each SWMU. Holloman Air Force Base (HAFB) may cease at least temporarily ground-water sampling at the subject SWMUs, with the exceptions of SWMUs 113B and 116. After completion of the additional characterization work for these SWMUs, the NMED will decide if further characterization is warranted, including any other ground-water monitoring that must be done by HAFB.
3. Specific sampling details are not included in the letter and must be addressed in a RCRA Facility (RFI) work plan for each SWMU. Such work plans must be reviewed and approved by the NMED before the work is carried out. The plans must contain details as to the history of each SWMU, potential contaminants of concern (PCOC), depths and location of characterization trenches, sampling locations (including depths), analytical parameters and methods, quality controls, and any other details as determined by the NMED as necessary to properly investigate each SWMU.
4. Regarding SWMU 108, item #6, of HAFB's letter, the NMED believes that HAFB meant to state "Suspend LTM activities at LF-23" instead of "Suspend LTM activities at LF-19". Additionally, a geophysical survey would be useful to search for any potential burial locations at this SWMU.
5. Extensive characterization of SWMU 101/109 is required to determine the exact boundaries of the landfill, to determine the nature and extent of any releases of contaminants from the landfill, and to characterize the landfill's contents. At minimum, HAFB is required to dig test pits, sample and analyze soil from test pits and/or soil borings, and must conduct geophysical, methane/landfill gas, and passive soil-gas surveys. The NMED may require a corrective measures study for the landfill following completion and approval of the characterization activities.
6. Regarding SWMU 116, a geophysical survey is needed to search for any buried waste at this site; this must be done in addition to trenching. In addition, a ground-water investigation plan to determine the source of TCE thought to lie upgradient from SWMU 116, and to determine the nature and extent of this contamination, must be submitted to the NMED for approval. The ground-water monitoring plan must include quarterly sampling of the ground water.

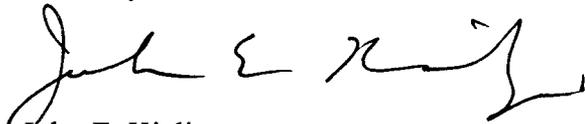
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7. Regarding SWMU 113B, samples intended for characterization purposes must be analyzed for total levels of contaminants, not by the TCLP method. Any waste or releases that represent an unacceptable risk to human health or the environment must be remediated. If any excavated waste or contaminated soil is found to be hazardous, such waste may not be landfarmed as you correctly stated in your letter. Additionally, as mentioned previously HAFB must continue ground-water monitoring at SWMU 113B. The source of solvents and any other contaminants in the ground water must be determined, and the nature and extent of the contamination fully defined. HAFB must also submit to NMED for approval a ground-water monitoring plan for SWMU 113B that includes quarterly sampling of the ground water at this SWMU.

Other than for SWMU 101/109, HAFB must submit to the NMED for approval the RFI work plan for each SWMU within 90 days of receipt of this letter. The RFI work plan for SWMU 101/109 shall be submitted within 120 days from receipt of this letter. The ground-water investigation plan for SWMU 113B shall be submitted within 90 days of receipt of this letter. Finally, the ground-water monitoring plan for the characterization of the TCE contamination near SWMU 116 shall be submitted within 90 days of receipt of this letter.

Please contact Mr. Cornelius Amindyas of my staff at (505)-284-8617 if you have questions regarding this matter.

Sincerely,



John E. Kieling
Manager
Permits Management Program

JEK:ca/wpm

cc: J.Bearzi, NMED HWB
C.Amindyas, NMED HWB
W.Moats, NMED HWB
L.King, EPA
D.Holmquist, HAFB
D.Scruggs, HAFB

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