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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

January 21, 2005

Ms. Debbie Hartell
Chief Environmental
49 CES/CEV
550 Tabosa Ave.
Holloman AFB, NM 88330-8458

**RE: REQUEST FOR SUPPLEMENTAL INFORMATION (RSI) FOR THE
VOLUNTARY CORRECTIVE MEASURES WORK PLAN FOR T-38 TEST
CELL FUEL SPILL SITE (SWMU 229)
HOLLOMAN AIR FORCE BASE
EPA ID# NM6572124422
HWB-HAFB-04-001**

Dear Ms. Hartell:

The New Mexico Environment Department (NMED) has reviewed Holloman Air Force Base's Work Plan for Voluntary Corrective Measures T-38 Test Cell Fuel Spill Site dated November 2003.

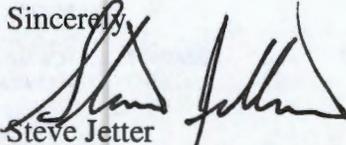
Attached are comments and issues that must be addressed in order to complete the review and approval of the proposed work plan.

Please submit the requested information in the form of a revised work plan within forty five (45) 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.

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If you have any questions, please contact me at (505) 845-5932.

Sincerely,



Steve Jetter
HWB Permits Management Program

cc: James Bearzi, NMED HWB
John Kieling, NMED HWB
Cornelius Amindyas, NMED HWB
James Harris, EPA-Region 6
David Scruggs, HAFB
File: Reading and HAFB-HSWA 2005

Request for Supplemental Information
T-38 Test Cell Voluntary Corrective Measures Work Plan
November 2003

1. The work plan must discuss in sufficient detail the site history in order to support the need to perform the proposed work. The work plan must provide scaled drawings with sufficient detail to adequately define the boundaries of the proposed excavation. Cross sections through the contaminant plume should be presented that indicate depths of the soil contamination. Site conditions as presented in the February 2002 Multiphase Modeling and Recommendations Report or other more recent data should be included.
2. Prior to excavating an area, all monitoring wells or extraction wells in that area should be gauged for depth to water and presence of phase-separated hydrocarbons (PSH).
3. The proposed excavation work is to take place over a period of several years. Therefore site control issues should be addressed in the work plan. Controls used during both active times and periods of inactivity should be addressed.
4. Section 2.2.2, SVE Treatment System Abandonment and Removal - This section discusses the need to sample the piping for proper disposal. Please provide protocols on the testing frequency and test methods to be used.
5. Section 2.3, Soil Excavation - This section states that contamination should not be present in the upper 15 feet based on historical knowledge. NMED's review of DPT sampling performed in 2002 shows significant contamination above 15 feet below ground surface particularly beneath the former tank locations. Therefore, sufficient soil screening as described in Section 3.2 shall be conducted of the overburden soils to ensure that proper segregation of this material is performed. Also, based on DPT sampling that was performed to delineate the free product plume found in 2000/2001, it appears that a lobe of contamination extends further to the east than the proposed excavation limits outlined in Figure 3. This area should be included for excavation or further investigation.
6. Section 3.4, Soil Stockpile Samples and Table 3-1 - The text describing sampling requirements for the contaminated soil and overburden soil does not match the sampling frequency in Table 3-1. NMED approves the frequency as outlined in the Table 3-1. Therefore, laboratory analysis for any excavated soil that is used as backfill material shall be sampled at a frequency of 1 sample per 500 cubic yards of soil. Laboratory samples obtained as part of the segregation process may be counted in this total. Revise Section 3.4 to reflect these changes.
7. Section 8, Data Reporting - In addition to reporting on the excavation activities, the closure report shall include a summary of previous investigations and remediation activities that have been performed at the site. Please add this to the work plan data reporting section.