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State of New Mexico *HWB 805*
ENVIRONMENT DEPARTMENT

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RON CURRY
SECRETARY

DERRITH WATCHMAN-MOORE
DEPUTY SECRETARY

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

April 25, 2005

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

**RE: NOTICE OF ADMINISTRATIVE INCOMPLETENESS FOR PERMIT
MODIFICATION FOR NO FURTHER ACTION FOR 10 SWMUs AND AOCs
HOLLOMAN AIR FORCE BASE NM65721224422
HWB-HAFB-04-021**

Dear Ms. Hartell:

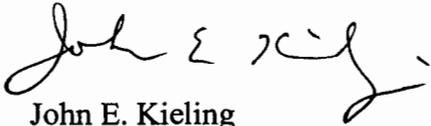
The New Mexico Environment Department (NMED) has reviewed for administrative completeness the Holloman Air Force Base (HAFB) proposal for permit modification requesting no further action and the supporting Statement of Basis (SOB). The SOB, which describes the seven (7) solid waste management units (SWMUs) and three (3) areas of concern (AOCs), was dated November 2004.

Pursuant to its authority under the New Mexico Hazardous Waste Act, N.M.S.A. 74-4-1 *et seq.*, and regulations promulgated pursuant thereto, the Hazardous Waste Bureau (HWB) has determined that the subject document is administratively incomplete. HWB's comments on each of the sites in the document are attached to this letter, to assist in phrasing the revised SOB for those sites that appear suitable for NFA. Please incorporate your response to the comments and the items in the enclosed attachment into the final version of the SOB, and submit to NMED, four hard copies and two 3.5-inch diskettes or CDs compatible with Microsoft Word, forty-five (45) calendar days from the date you receive this letter.

Ms. Hartell
April 25, 2005
Page 2 of 2

If you have any questions regarding this matter, please contact Cornelius Amindyas or me at (505) 284-8617, and (505) 428-2535, respectively or at the above address.

Sincerely,



John E. Kieling
Manager
Permits Management Program

JEK: ca

cc: J. Bearzi, NMED HWB
C. Amindyas, NMED HWB
L. King, EPA-Region 6 (6PD-N)
D. Holmquist, HAFB

File: ~~HAFB~~ 05 and Reading

ATTACHMENT
NMED COMMENTS ON THE STATEMENT OF BASIS
7 SOLID WASTE MANAGEMENT AND AREAS OF CONCERN
HOLLOMAN AIR FORCE BASE
April 25, 2005

A. GLOBAL COMMENTS

- i. The NMED soil-screening levels (SSLs) presented in the Tables of the Statement of Basis (the document) do not match the NMED approved numbers. Please use the current NMED SSLs [NMED Technical Background Document for Development of Soil Screening Levels, Rev. 2.0 (February 2004; updated August 2004)] that are accessible on the NMED web page at:
<http://www.nmenv.state.nm.us/hwb/guidance.html>
- ii. Provide a Table of all Acronyms after the Table of Contents.
- iii. Incorporate the Maps, Figures and Tables into the text that describes each and every SWMU and AOC, which appear suitable for NFA, as HAFB had in the February 3, 2004 draft Statement of Basis (SOB). That means the Figures and Tables for each site shall be with the text describing that particular site, and not at the end of the whole document.
- iv. Page 2, top sentence reads **“The HSAW portion of the RCRA permit identified sites at the Base requiring a RCRA Facility Investigation.”** Please define each acronym before using it anywhere in the text. Explain what document HSAW is, since NMED does not have such a document.
- v. Check all Figures and Maps to ensure that the references in the text correspond with the respective map. For example, the first paragraph on page 7 describes SWMU 82 as being in Figure 5, but a look at the map indicates that the site is SWMU136, and SWMU 82 is nonexistent. Similarly, on page 13, SWMUs 139 and 140 are stated to be on Figure 8, while it is in Figure 7. Also, Figure 9 should be more correctly replaced with Figure 8; Figure 11 should be replaced with 10, and Figure 12 should read Figure 11. Please correct these inconsistencies.

B. Each Section, “BASIS FOR DETERMINATION”.

These sections should state which criterion was used or refer the reader to Table 1. It appears from the language in the text that most, if not all proposals for NFA, were based on Criterion 5 “SWMU characterized and remediated... and data indicates... an acceptable risk...” However, Table 1 shows that other criteria were used on several sites.

C. COMMENTS ON SWMUS AND AOCs

SWMU 4 – Oil/Water Separator (O/WS)

This site is not suitable for NFA for the following reasons:

1. Does SWMU 4 include the drain field? If so, the investigation of this part of the SWMU must be discussed in the text.
2. How was the location of the drain field determined? Unless as-built drawings are available, physical determination of its location is required (i.e. trenching to locate distribution lines or drilling that shows evidence of the leach field (gravel, piping)).
3. The drain field sampling depths are not adequate for determining whether a release has occurred. Samples collected at 04-06, 04-07 and possibly 04-05 are above the assumed depth of the drain field lines and therefore not representative of site conditions.
4. It is stated that SWMU 4 and SWMU 82 are related and collocated. Therefore, sampling at SWMU 4 OWS and drain field must include analysis for pesticides which were detected at SWMU 82.
5. Explain why in the February 2004 report (page 8), the concentration of arsenic was stated as 13 mg/kg, but in the November 2004 report (page 5, end of last full paragraph) it was reported as 1.3 mg/kg. Provide laboratory data that support either result and explain the discrepancy.

SWMU 82 - Refuse Collection Truck Wash Rack

This site does not appear suitable for NFA for the following reasons:

6. History, 1st paragraph - This paragraph states that the O/WS (SWMU 4) was connected to the Base sewer system. However, figure 3 indicates that it was connected to its own drain field. Which is correct?
7. Table 3 - The sample numbers do not match with Figure 4. Assuming sample number 91JUL1108-007 corresponds to soil boring SB-08-07, there is no such soil boring on the map. Also, the text (1st paragraph, page 8) states that organo-chlorine pesticides were found in SB-08-02 but Table 3 shows they were found in 91JULH008-003 (SB-08-03?). For clarity, please match all sample numbers in Tables with the corresponding locations on maps.
8. Table 3 - Bold all constituents that were detected above NMED WQCC or EPA MCLs (i.e. benzene, ethylbenzene, heptachlor epoxide, lead).
9. All groundwater samples collected as part of the long term monitoring (LTM) program were collected from upgradient or cross gradient wells. No ground water samples have been collected from the down-gradient well MW-08-02 nearest to the assumed source

area. Therefore, current ground water condition cannot be assessed. See comments from NMED letter for additional ground water investigation (February 2005).

10. Fifth paragraph page 8 and Table 4 refer to monitor well MW-08-05. There is no MW-08-05 shown on figure 4. Also, some of the constituents identified in the text as being identified in MW-08-05 appear to be associated with MW-08-03 according to information presented in Table 4. Please correct.
11. Provide a map showing the location of SWMU 82, since it is not indicated on Figure 5.

SWMU 136 - Building 1119 Wash Rack Drainage Pit

12. Provide the soil analytical results from the Table 2 RFI in the revised SOB.
13. Please include the Table 2 RFI and March 2003 sampling locations on the site map.
14. Please use the same sample numbering scheme for Table 5 and Figure 5.
15. 1st paragraph, page 11 - The text in this paragraph states that samples were collected from each corner of the excavation. However, Figure 5 shows sampling locations as the mid point of each sidewall. Please correct this language in the revised SOB to reflect the correct sampling locations.

SWMU 166 - MOBSS Drainage Lagoon

16. Last paragraph, page 17 and 4th paragraph page 18 - The text states that benzene, toluene, xylene were detected. However, Table 6 shows that ethylbenzene, not benzene, was detected. Please correct this discrepancy in the revised SOB.
17. Figure 9 does not show the location of SWMU 166. An additional figure showing the sampling locations in relation to the SWMU must also be included in the revised SOB.

SWMU 106 - Main Base Landfill

18. Use a different criterion for NFA i.e., Criterion #4 - SWMU characterized and remediated under another authority/agency [i.e. Solid Waste Bureau].

AOC 2 - Former Sewage Disposal Drain Field

19. The request for NFA at this site is premature. HAFB has not yet submitted a final RFI report for this site. Therefore, there is no official document on which NMED can make an NFA determination.