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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

July 27, 2005

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

**RE: REQUEST FOR SUPPLEMENTAL INFORMATION: RCRA FACILITY
INVESTIGATION REPORT FOR AOC-2, FEBRUARY 2005
HOLLOMAN AIR FORCE BASE
EPA ID# NM6572124422
HWB-HAFB-05-001**

Dear Ms. Hartell:

The New Mexico Environment Department (NMED) Hazardous Waste Bureau (HWB) has reviewed the above referenced document for technical completeness. Based on staff review, Area of Concern-2 (AOC-2), also known as the Tower Site, is not eligible for a No Further Action (NFA) determination at this time. The enclosed attachment lists deficiencies that Holloman Air Force Base (HAFB) must address before NMED can make a final determination for NFA.

Please submit the requested information to NMED within sixty (60) calendar days from receipt of this Request for Supplemental Information. 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.

Ms. Debbie Hartell

July 27, 2005

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If you have any questions regarding this matter or if you would like to discuss the comments prior to your response, please contact David Strasser at (505) 222-9526.

Sincerely,



Cornelius Amindyas

HAFB Project Leader

Permits Management Program

CA/ds

cc: James Bearzi, Chief, NMED, HWB
William Moats, NMED, HWB
David Strasser, NMED, HWB
Debra Telles, EPA, Region 6 (6PD-F)
Dan Holmquist, HAFB
File: Reading and HAFB-HSWA

**ATTACHMENT
REQUEST FOR SUPPLEMENTAL INFORMATION
RCRA FACILITY INVESTIGATION REPORT FOR AOC-2, FEBRUARY 2005
HOLLOMAN AIR FORCE BASE
EPA ID# NM6572124422
TASK # HWB-HAFB-05-001**

NMED Requirements for RCRA Facility Investigation Reports

For purposes of determining whether or not an Area of Concern (AOC) is suitable for a No Further Action (NFA) determination, the document proposing the AOC for NFA must be complete and of high quality. The RCRA Facility Investigation (RFI) Report reviewed in this document does not meet NMED document quality requirements. It is NMED policy that everything needed to support a decision for NFA must be included in any document that proposes NFA for an AOC.

The following are NMED's comments and concerns on HAFB's RFI Report for AOC-2, dated February 2005. The quotations in bold print are taken directly from the subject document. Please address the comments and submit the additional information as directed in the cover letter.

COMMENTS

1. Table of Contents, "**Figures**"

The Figure designations in the Table of Contents (TOC) do not match the designations on the actual Figures. For example, Figure 3 in the TOC is actually Figure 9 and should be labeled "AOC-2 Potentiometric Surface Map, June 2004", NOT September 2004. NMED requests that HAFB revise the Figures section of the TOC so that it matches the designations shown on the actual Figures.

2. Page 1-2, **Section 1.3, "Scope of Work"** 6th Bulleted Item:

The NMED's Work Plan approval letter for this RFI, dated May 6, 2004, requested that pesticides be analyzed for in the soil and ground water. According to the Scope of Work, pesticides were not analyzed for. NMED requests that HAFB provide justification as to why HAFB did not analyze for pesticides.

3. Page 3-3, 7th Sentence, "**Section 3.5, Site Hydrology**":

NMED requests that HAFB revise the reference to Figure "3" to read Figure 9.

4. Page 4-1, "**Section 4.1, Document Review**," Second Paragraph, 3rd and 4th Sentences:

NMED requests that HAFB revise the reference to Figures "4, 5 and 6" to read Figures 3, 4 and 5. In the next sentence, the reference to Figure "5" should read Figure 4.

5. Page 5-1, 1st Sentence, "**Section 5.1, Soil Borings and Sampling**":

NMED requests that HAFB revise the reference to Figure "7" to read Figure 6.

6. Page 7-3, "**Section 7, Nature and Extent**", 1st and 2nd Sentences:

NMED requests that HAFB revise the reference to Tables 2 through "10" be revised to read Tables 2 through 8. In the next sentence, the reference to Figures 8 and "9" should read Figures 8 and 11.

7. Page 7-3 "**Section 7, Nature and Extent**", 3rd Sentence:

This sentence suggests that the results for analyte groups that were reported as non-detectable were not graphically presented. In fact, these results were presented on Figures 7 and 10. NMED requests that HAFB revise this sentence to reflect this.

8. Page 7-3, "**Section 7.1.1, Soil Headspace Results**", 1st and 4th Sentences:

1st Sentence: "**Soil borings SB-02 through SB-05 were completed to 20' below ground surface (bgs). Soil boring SB-06 was completed to 18' bgs**". NMED requests that HAFB revise this sentence to reflect this.

4th Sentence: "**According to the Soil Headspace Logs, the lowest PID reading was 0.6 in the 1' to 2' bgs interval in SB-05 and the highest was 11.58 in the 3' to 4' bgs interval in SB-01**". NMED requests that HAFB revise this sentence to reflect this.

9. Page 7-3, "**Section 7.1.2, Soil Analytical Results**", 1st Paragraph, 1st Sentence:

NMED requests that HAFB revise the reference to Table "1" to read Table 2, the reference to Table "2" to read Table 3, and the reference to Table "3" to read Table 4.

10. Page 7-3, "**Section 7.1.2, Soil Analytical Results**", 3rd Paragraph, 2nd Sentence:

This sentence states that there was one occurrence of arsenic (4.91 mg/kg in SB-04-3) was above the NMED Residential Soil Screening Level (SSL). In fact, there were two occurrences of arsenic above the SSL of 3.9 mg/kg. The results for soil boring SB-03-3 showed arsenic at 4.12 mg/kg. NMED requests that HAFB revise this sentence to reflect these concentrations.

11. Page 7-4, "Section 7.2.1, Ground Water Analytical Results", 4th Sentence:

NMED requests that HAFB revise the reference to Figure "9" to read Figure 11.

12. Tables 2, 3 and 4 and the Table on Page 7-4

These tables show the NMED Residential SSLs from NMED's February 2004 SSL Table A-1. This Table was updated in August 2004, and is available on the Hazardous Waste Bureau web page (<http://www.nmenv.state.nm.us/hwb/guidance.html>). NMED requests that HAFB revise these tables to reflect the August 2004 SSL table updates.

13. Figure 6:

Site-specific map figures must include a coordinate system (i.e., UTM, latitude/longitude), the boundaries of the site shown on the site map and the coordinates of site boundaries on the site map. High accuracy (+/-3 ft) GPS coordinates are acceptable. NMED requests that HAFB revise this Figure accordingly.

14. Figure 8, Sample Result Table for Boring SB-02:

NMED requests that HAFB revise the reference to sample SB-02-"4" to read SB-02-9.

15. Figure 11, Title Block

NMED requests that HAFB revise the title of this Figure to read AOC-2 "Groundwater" Analytical Results, RCRA-8 Metals.

16. Appendix F, Analytical Data Package

The laboratory analytical data package does not contain the results reports for soil samples AOC2-SB04-3 and AOC2-SB04-9 and groundwater sample AOC2-MW01. NMED requests that HAFB provide a copy of these laboratory results reports.