

HAFB 2006

State of New Mexico
ENVIRONMENT DEPARTMENT



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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

January 17, 2006

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

**SUBJECT: NOTICE OF DEFICIENCY: ADDITIONAL GROUNDWATER
MONITORING WORK PLAN FOR SS-61 (AOC 1001), MAY 2005
HOLLOMAN AIR FORCE BASE EPA ID NO. NM6572124422
HWB-HAFB-05-008**

Dear Ms. Hartell:

The New Mexico Environment Department (NMED) has reviewed the subject document, which was submitted toward the establishment of a groundwater sampling program at site SS-61 at Holloman Air Force Base (HAFB) as directed by the NMED. This work plan will allow the assessment of monitored natural attenuation (MNA) as a viable corrective measure for this site. Based on this review, NMED has determined that the Work Plan cannot be approved at this time, as revisions are necessary. The following are the deficiencies that HAFB (the Permittee) is required to address before the Work Plan can be approved.

WORK PLAN DEFICIENCIES

1. **Page 1-1, Section 1.0, Introduction, 2nd Paragraph**

In a letter from NMED dated February 4, 2005 (which prompted submittal of the subject work plan), the Permittee was advised that a separate plume of 1,1,2-trichloroethylene (TCE) might emanate from a possible source located to the east-southeast of the subject site's monitoring well MW-02. NMED required that the Permittee perform an additional investigation of the potential TCE plume. This paragraph of the work plan indicated that the TCE plume would be designated as a separate area of concern (AOC) and would receive separate funding for an investigation. Since no timetable for this action was provided, the Permittee must submit a tentative timetable for AOC designation and RCRA Facility Investigation work plan submittal in response to this Notice of Deficiency.

2. **Page 2-1, Section 2.1, Groundwater Sampling and Appendix D, Quality Assurance Project Plan Addendum, Table 4-1, Summary of Field QC Samples, "Number of Field Samples"**

This Section and Table indicate that only 10 field samples would be collected per sampling event. However, sampling of 11 monitoring wells is proposed.

HAFB must provide clarification of this apparent discrepancy.

3. **Page 2-1, Section 2.1, Groundwater Sampling**

This Section indicates that monitoring well MW-04 was added to the monitoring program. Due to this well's close proximity to MW-06 and its historically low levels of contaminants. This well shall be deleted from the monitoring program and replaced with monitoring well MW-07 to provide monitoring of the western periphery of the plume. This is in addition to the other 10 wells to be monitored.

This Section also indicates that monitoring wells will be sampled twice per year for two years. In order for the NMED to consider MNA as a viable corrective measure at this site, HAFB is required to conduct quarterly sampling and reporting for a two-year period.

4. **Page 3-1, Section 3.0, Groundwater Monitoring Report**

This Section indicates that Monitoring Reports would be submitted, but it does not indicate when the reports will be submitted.

HAFB is required to submit quarterly Monitoring Reports for the two-year sampling cycle, prepared in accordance with NMED's Position Paper entitled "General Reporting Requirements for GW Monitoring". This paper is located on the NMED Hazardous Waste Bureau (HWB) website at <http://www.nmenv.state.nm.us/hwb/guidance.html>.

5. **Appendix D, Quality Assurance Project Plan Addendum, Table 4-2, Summary of Laboratory QC Limits**

Table 4-2 provides the Estimated Quantitation Limits (EQLs), not Method Detection Limits (MDLs), for the various constituents to be sampled. The following constituents have EQLs that are higher than the groundwater quality standards established by the NM Water Quality Control Commission (NMWQCC):

Constituent	EQL (µg/L)	NMWQCC Standard (µg/L)
1,2-Dibromoethane (EDB)	5	0.1
Vinyl Chloride	5	1
Benzo(a)pyrene	10	0.7

The Permittee must ensure that the MDLs for these and all constituents will be lower than the NMWQCC Standards. Note also that the MCL for EDB is 0.00005 mg/L.

6. The November 2003 Feasibility Study Work Plan for Spill Site SS-61 indicated in Section 4.1.2, Groundwater Sampling Schedule, that monitoring well MW-03 would be monitored weekly for the presence of free product for a period of one year. There is no indication in subsequent reports that this monitoring was ever conducted.

If this monitoring was conducted, the Permittee is required to provide the data and a discussion regarding the results. If it was not conducted, the Permittee is required to conduct this monitoring for a period of one year and provide the results in the quarterly monitoring reports. In the event that more than 1/8-inch of free product (non-aqueous phase liquid) is discovered during a monitoring event, the Permittee must notify the NMED within five calendar days.

Please respond to this Notice of Deficiency within thirty (30) calendar days of receipt of this letter.

Ms. Debbie Hartell
January 17, 2006
Page 4 of 4

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 of my staff at (505) 222-9526 or at the above address.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

JPB:dcs

cc: J. Kieling, NMED, HWB
W. Moats, NMED, HWB
C. Amindyas, NMED, HWB
D. Strasser, NMED, HWB
D. Tellez, EPA, Region 6 (6PD-F)
D. Holmquist, HAFB

File: Reading and HAFB 2005