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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

January 27, 2006

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

**SUBJECT: NOTICE OF DEFICIENCY: MONITORED NATURAL ATTENUATION
REPORT FOR SS-61 (AOC 1001), JUNE 2005
HOLLOMAN AIR FORCE BASE, EPA ID# NM6572124422
HWB-HAFB-05-007**

Dear Ms. Hartell:

The New Mexico Environment Department (NMED) has reviewed the subject document, which was submitted to support the use of monitored natural attenuation (MNA) as a corrective measure at Holloman Air Force Base (HAFB). HAFB (the Permittee) is hereby advised that for the NMED to consider MNA as a viable corrective measure at this site, the Permittee is required to conduct quarterly monitoring and reporting for a two-year period. This monitoring shall be conducted in accordance with the "Additional Groundwater Monitoring Work Plan for SS-61 (AOC 1001)", dated May 2005, and the subsequent NMED Notice of Deficiency dated January 17, 2006. Should substantial improvement in groundwater quality not be shown during this two-year period, the Permittee shall be required to submit a Corrective Measures Study (CMS) that proposes alternative remedies. If MNA is determined to be a potential remedy for this site, the Permittee will need to proceed through the CMS process as outlined in Appendix 4-C of the HAFB Permit.

Based upon review of the MNA Report, NMED has noted the following deficiencies.

REPORT DEFICIENCIES

1. Analytical results obtained during the 2004/5 quarterly sampling events for total dissolved solids, conductivity, alkalinity and chloride are very different between sampling points. Therefore, it appears that monitoring wells MW-04 and MW-08 may be in a hydrogeologic zone that is different from monitoring wells MW-01, MW-03 and MW-06.

The Permittee is required to submit a discussion on this possibility and, if this scenario is possible, its ramifications.

2. Analytical results obtained during the 2004/5 quarterly sampling events indicate that concentrations of volatile organic compounds (VOCs) in monitoring well MW-03 had increased substantially between the April 2004 and January 2005 sampling events. The following table provides these concentrations (in µg/L):

Constituent	NMWQCC Standard	April 2004	June 2004	September 2004	January 2005
Benzene	10	7,180	10,600	12,600	16,900
Ethylbenzene	750	ND	231	295	309
Toluene	750	734	1,950	3,460	4,060
Xylenes	620	1,870	3,050	4,150	4,370
1,2-dichloroethane (EDC)	10	ND	395	477	602

ND – Non-Detect

This increase in concentrations may indicate that a source of VOCs is still present at the subject site. Various documents submitted for this site refer to the possible presence of an oil and water separator at the southeast corner of Building 1079 and a concrete sump located at the northwest corner of Building 1079. None of the documents submitted indicate that these locations were ever investigated as a possible source nor was the operational status of either structure provided.

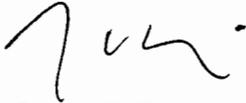
The Permittee is required to submit a discussion regarding the status of these structures and their potential to act as a continuing source of VOC contamination at this site. This discussion must include a figure depicting the locations of these structures. Depending on the response, NMED may require additional soil investigation at these two locations.

Please respond to this Notice of Deficiency within thirty (30) calendar days from the date you receive this letter.

Ms. Debbie Hartell
January 27, 2006
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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 of my staff at (505) 222-9526.

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, 2006