

HAFB 00

State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1

Santa Fe, New Mexico 87505-6303

Telephone (505) 428-2500

Fax (505) 428-2567

www.nmenv.state.nm.us



BILL RICHARDSON
GOVERNOR



RON CURRY
SECRETARY

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 14, 2006

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

**SUBJECT: NOTICE OF DEFICIENCY: VOLUNTARY CORRECTIVE MEASURE
REPORT FOR DP-64 (AOC 1), JUNE 2005
HOLLOMAN AIR FORCE BASE, EPA ID# NM6572124422
HWB-HAFB-05-009**

Dear Ms. Hartell:

The New Mexico Environment Department (NMED) has reviewed the Holloman Air Force Base (HAFB) document entitled "Final Site-Specific Final Report for Ordnance and Explosive Removal Action at Holloman AFB". Based on this review, NMED has determined that a No Further Action (NFA) determination cannot be made at this time. The following are the deficiencies that HAFB (the Permittee) is required to address before such a determination can be made.

1. Page 2-7, Section 2.7.3, Geophysical Investigation

The geophysical prove-out procedure determined that the use of the MTADS EM-61 electromagnetic system was the most effective method of detecting anomalies at the subject site. It was therefore the only method employed to conduct the site-wide geophysical investigation. Section 2.7.3 states the following: "Items such as individual glass ampoules cannot be detected using DGM (*digital geophysical mapping*). However, if disposal of the ampoules occurred in the same location as metallic debris or in an area of ground disturbance large enough to be detected, then the geophysical survey may indicate where intrusive remediation should be considered".

NMED has concerns about whether the EM-61 geophysical survey was able to locate all of the subsurface glass ampoules that were potentially disposed of at this site, particularly those that were not associated with metal debris or large areas of ground disturbance. According to Figure B-5, at least one glass ampoule was found outside of the 10 foot by 60 foot area. The Permittee is required to provide a discussion of the efficacy of the geophysical survey performed at the site to locate all subsurface glass ampoules.

In addition, there is no clear discussion of the maximum depth that the EM-61 electromagnetic system was able detect anomalies at this site. The Permittee is required to provide a discussion on this issue.

2. Page 2-9, Section 2.11, Soil Sampling

This Section indicates that soil samples were collected at locations where the glass ampoules were found. Based upon the quality control reports, there appears to have been six (6) soil samples collected (DP64-01 through DP64-06); these were only analyzed for chemical agents (i.e. ABP, mustard, and Lewisite). This Section indicates only that the results were negative for chemical agents and agent breakdown products. The locations of these samples were not shown on any figures nor were the results tabulated or laboratory reports provided.

The Permittee is required to provide a figure showing the locations of sample collection, a tabulation of the results (including analytes and test methods, method detection limits, sample depths and dates), and the laboratory reports.

3. Section 2.11, Soil Sampling

According to the Dig Sheets and other field documentation provided in this report, ordnance and explosive (OE) material and scrap was discovered in several "burn pits" at the site. These appear to be target ID numbers 104, 105, 109, 112 and 137. The Section on soil sampling makes no mention of any soil samples being collected at these "burn pit" locations. Therefore, the Permittee is required to submit a work plan to collect a minimum of one soil sample from the bottom of the "burn pits" and analyze the soils for RCRA metals, volatile organic compounds (VOCs), semi-volatile compounds (SVOCs) and explosives.

4. Appendix B, Site Maps, Figures B-5 and B-6

These figures show the locations of the anomalies discovered during the geophysical survey and subsequent intrusive investigation. However, these figures do not show the target ID numbers. Therefore, the Permittee is required to resubmit these figures with the target ID numbers shown.

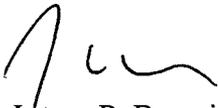
Ms. Debbie Hartell
April 14, 2006
Page 3 of 4

5. **Appendix D, Figure 3**

Figure 3 shows the results of the geophysical survey. However, most of the target ID numbers are not readable as they bleed into the background of the figure. Therefore, the Permittee is required to revise and resubmit this figure with readable target ID numbers.

Please respond to this Notice of Deficiency by June 15, 2006. If you have any questions regarding this letter, 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. Griffin, HAFB
File: Reading and [REDACTED]