

HAFB 06

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ENVIRONMENT DEPARTMENT



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RON CURRY
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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 MEASURES
WORK PLAN, DISPOSAL PIT 63 (DP-63), FEBRUARY 2006
HOLLOMAN AIR FORCE BASE, EPA ID# NM6572124422
HWB-HAFB-06-001**

Dear Ms. Hartell:

The New Mexico Environment Department (NMED) has reviewed the subject Work Plan, which was submitted for the performance of voluntary corrective measures at Disposal Pit 63 (DP-63) at Holloman Air Force Base (the Permittee). This site is also known as AOC-3. NMED has determined that the Work Plan cannot be approved at this time, as revisions are necessary. The following are the deficiencies the Permittee is required to address before the NMED can make a decision about approval of the Work Plan:

WORK PLAN DEFICIENCIES:

1. Page 2-1, Section 2.1.1, Soil Boring Samples, 3rd Sentence

This sentence states that among other constituents detected in subsurface soils during the 2000 Preliminary Assessment/Site Inspection (PA/SI), PCBs, pesticides, and explosives were detected. However, according to the analytical results tables for this PA/SI presented in Appendix A of the subject Work Plan, PCBs and pesticides were not detected and soil samples were not analyzed for explosives. The Permittee must clarify this apparent discrepancy.

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2. **Page 2-4, Section 2.1.1.5, Metals, 1st Paragraph**

This paragraph states that manganese was detected in soil sample DP-02 at 46'-47' below ground surface at a concentration of 4,930 mg/kg. This concentration is in excess of the NMED residential soil screening level (SSL) of 1,550 mg/kg. This paragraph does not acknowledge this exceedance.

The Permittee is required to acknowledge that the manganese concentration exceeds the SSL, provide an explanation for the possible source of this contamination, and a discussion on any proposed remedy. The Permittee is reminded that manganese has been detected in ground water at concentrations significantly above New Mexico Water Quality Control Commission standards in all the monitoring wells at this site.

3. **Page 2-5, Section 2.2.1.1, Soils, 2nd Paragraph**

This paragraph states that surface soil samples were not collected at boring locations SS09 and DP11. This appears to be a mis-statement as there is no boring SS09 at this site and the Remedial Investigation Tables show that a surface soil sample was collected from boring DP11.

The Permittee is required to clarify this paragraph.

4. **Page 2-8, Section 2.4, Remedial Action for MEC Removal**

This section indicates that subsurface anomalies that were or will be detected during geophysical investigations will be removed. However, the section does not indicate that any soil samples will be collected for analysis from under these anomalies.

The Permittee is required to provide a plan to NMED for analyzing soils under those anomalies that have the potential for impacting soil with hazardous constituents (e.g. containers, ordnance).

5. **Page 3-3, Section 3.3.1, Monitoring Well Installation**

This section indicates that one soil sample will be collected from monitoring well borings DP63-MW06 and DP63-MW08. However, the depth of soil sample collection is not provided.

The Permittee is required to provide the depth of sample collection from each boring and the rationale for selecting the depths.

6. **Page 3-3, Section 3.4, Laboratory Analysis**

This section indicates that, during sampling activities, soil and ground water samples will not be analyzed for explosives.

Given the past activities of munitions disposal at this site, the Permittee is required to analyze all soil and ground water samples for explosives by EPA Method 8330. This is in addition to analyzing other constituents at the disposal site under other methods. These results will determine if future explosives analysis will be required. NMED recognizes that explosives were not detected in ground water during the 2000 PA/SI.

7. **Page 4-3, Section 4.3.2.1, Soil Screening, 1st Full Paragraph, 5th Sentence**

This sentence states that soils demonstrating a TPH concentration below 880 mg/kg will be stockpiled for backfill. This sentence must be revised to also state that soil used for backfill shall not have TPH hazardous constituent (e.g., VOCs, SVOCs) concentrations in excess of NMED residential soil screening levels.

8. **Page 4-4, Section 4.3.2.3, Confirmation Soil Sampling, Page 5-2, Section 5.4, Excavation Confirmation Sampling, and Table 4-1**

The Work Plan must be revised to show that, in addition to collecting confirmation samples at a frequency of one per 20 linear feet per excavation sidewall and one per sidewall, a minimum of two soil samples shall be collected from any sidewall greater than 18 feet in length. Also, confirmatory sampling shall be biased to areas with the greatest potential for contamination.

9. **Page 5-1, Section 5.1.1, Field Screening, 2nd Paragraph, 2nd Sentence**

This sentence states that initial field screening will be conducted on one sample per 100 cubic yards (cy) of soil removed.

The Permittee is required to conduct field screening at an interval of one sample per every 25 cy of soil removed.

10. **Page 5-1, Section 5.1.3, Laboratory Validation, 1st Sentence**

This sentence indicates that a minimum of one sample per site will be subject to laboratory validation.

The Permittee is required to collect a minimum of two samples from suspect soil for laboratory validation.

11. **Page 5-2, Section 5.4, Excavation Confirmation Sampling, Page 5-3, Section 5-4-2, Analytical Methods, Table 3-1, Table 4-1, Table 5-2, and Appendix G, Tables 2-2, 3-1 and 3-2**

The Permittee must revise these sections and tables to indicate that all samples will be analyzed for explosives by EPA Method 8330.

12. **Page 5-2, Section 5.4.1, Stockpile Sampling, 1st Sentence**

This sentence states that stockpiled overburden soils will be sampled every 500 cy.

The Permittee is required to sample stockpiled soil every 200 cy.

13. **Page 6-1, Section 6.3, Evaluation of Metals**

This section indicates that metals will only be evaluated against background levels presented in the "Basewide Background Study"(Radian, 1993).

The Permittee is also required to evaluate metals against the current NMED residential risk-based soil screening levels for conducting a human-health risk screening-level assessment.

14. **Table 4-1, Excavation Sampling Quantities and Analysis**

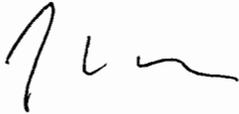
Table 4-1 includes a column showing the "Frequency" of sample collection. NMED requires that the following changes be made regarding frequency:

- a) During "Field Screening" of un-impacted soils, sample every 25 cy (not 50 cy) for initial field screening purposes and every 50 cy (not 100 cy) for field confirmatory purposes.
- b) During "Field Screening" of suspect soils, sample every 25 cy (not 50 cy) for initial field screening purposes, every 50 cy (not 100 cy) for field confirmatory purposes, and for laboratory validation purposes sample every 100 cy (not 300 cy).
- c) Sample the "Stock Pile" for backfill characterization every 200 cy (not 500 cy).

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Please respond to this Notice of Deficiency by June 16, 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
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