

HAFB 06

State of New Mexico
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, SWMU 8 SOIL REMEDIATION, DECEMBER 2005
HOLLOMAN AIR FORCE BASE, EPA ID# NM6572124422
HWB-HAFB-06-002**

Dear Ms. Hartell:

The New Mexico Environment Department (NMED) has reviewed the Holloman Air Force Base (HAFB) document entitled "Voluntary Corrective Measures Work Plan, SWMU 8 Soil Remediation". The following are the deficiencies that HAFB (the Permittee) is required to address before the Work Plan can be approved.

1. General Comment

Based upon review of the subject Work Plan, which included review of applicable portions of the previous Phase I and Phase II remediation reports, the extent of soil and ground water contamination at this site has not been adequately characterized. Therefore, the Permittee is required to conduct additional site characterization activities prior to Phase III soil excavation, as follows:

- a) Figure 5 of the Work Plan shows the proposed boundary of the Phase III excavation. However, there is no indication as to how the southwest limit of the excavation was determined, as no soil sampling was conducted in this area. Therefore, the Permittee is required to submit a soil sampling plan as part of the revised Work Plan that will be

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required as a result of this Notice. This plan should include a sufficient number of samples to adequately characterize the remaining soil contamination at this site that is not underneath the adjacent structures. NMED understands that soil and ground water conditions under the adjacent structures will be evaluated under a separate Work Plan addendum after the Phase III excavation and sampling is conducted. Soils should be analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), total petroleum hydrocarbons (TPH), polychlorinated biphenyls (PCBs), and target analyte list (TAL) metals (see Comment No. 6).

- b) The Work Plan indicates that ground water at SWMU 8 is found at approximately 10 feet below ground surface. The Work Plan states that contaminated soils will be removed to approximately one (1) foot below the encountered ground water table. Contaminated soil is therefore in contact with ground water. The two previous remediation activities did not include ground water sampling and the proposed VCM does not include ground water sampling.

Therefore, the Permittee is required to submit a ground water sampling plan as part of the revised Work Plan that will be required as a result of this Notice. This shall be done prior to performing the Phase III excavation. The plan must include, at a minimum, the installation of two monitoring wells at the site, which can be temporary wells. One well should be installed within the boundary of the Phase II excavation and the other within the boundary of the proposed Phase III excavation. Ground water should be analyzed for VOCs, SVOCs, TPH, PCBs, TAL Metals and total dissolved solids (TDS).

2. General Comment

The Permittee is required to submit documentation regarding the Method Detection Limits of all soil and ground water analytes.

3. Page 3-1, Section 3, Excavation Procedures, 1st Paragraph, 2nd Sentence

This sentence states that soils contaminated by hydrocarbons at levels exceeding 880 mg/kg TPH will be removed. Based upon the description of the material released from the oil and water separator provided in Section 1.1.2, which included "oils, detergents and fuels" from an auto hobby shop, these materials are classified as "unknown oil". In accordance with the NMED TPH Screening Guidelines (November 2005), the residential TPH screening guideline for unknown oil is 800 mg/kg. Therefore, the Permittee is required to utilize the 800 mg/kg screening level. All sections of the Work Plan specifying TPH screening levels must be revised to reflect this change.

4. **Page 3-4, Section 3.3.3.1, Soil Screening, 1st Paragraph, 5th Sentence**

This sentence states that soils demonstrating a concentration below 880 (to be 800) mg/kg TPH 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.

5. **Page 3-5, Section 3.3.3.3, Confirmation Soil Sampling, Page 4-2, Section 4.2, Excavation Confirmation Sampling, and Table 3-1**

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 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.

6. **Page 4-1, Section 4.1.3, Laboratory Validation, 1st Sentence**

This sentence indicates that a minimum of one sample per site will be subject to laboratory validation. The Permittee shall be required to collect a minimum of two samples from suspect soil for laboratory validation. In addition, the November 2005 NMED TPH Screening Guidelines require that for sites with unknown oil sources, soil analysis must include VOCs, SVOCs, metals (TAL), and PCBs, as well as TPH. Therefore, the Permittee must revise the soil sampling plan to include laboratory analysis of soils for these parameters.

7. **Table 3-1, Sampling Plan and Related Sections**

Table 3-1 includes a column showing the "Frequency" of sample collection. NMED requires that the following changes be made regarding frequency to Table 3-1 and related sections:

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

8. **Figures 3, 4, and 5**

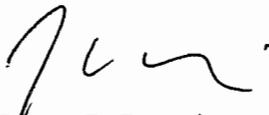
NMED requires that all site figures include a coordinate system (e.g., UTM, latitude/longitude) and the boundaries of the site must be shown on the figures. Coordinates of

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site boundaries must also be shown. High accuracy (+/-3 ft) GPS coordinates are acceptable. The Permittee is required to resubmit the subject figures satisfying these requirements.

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
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File: Reading and ~~HAFB 2006~~