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RON CURRY
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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 4, 2006

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

**SUBJECT: FINAL 2005 LONG-TERM GROUNDWATER MONITORING REPORT
HOLLOMAN AIR FORCE BASE, NEW MEXICO, MAY 2006
EPA ID# NM6572124422
HWB-HAFB-06-003**

Dear Ms. Hartell:

The New Mexico Environment Department (NMED) has reviewed Holloman Air Force Base's (the Permittee's) "Final 2005 Long-Term Groundwater Monitoring Report" (LTM Report) and has the following Solid Waste Management Unit (SWMU)-specific comments.

1. LF-01 – Main Base Landfill (SWMU 106)

The LTM Report recommended the following: *"The presence of benzene and manganese above the NM Groundwater Quality (NMGWQ) Standards in one monitoring well (S1-MW3) has triggered additional characterization associated with Site SS-02 and SS-05 to delineate the nature and extent. In accordance with the Class III Permit Modification for No Further Action (NFA) Status for seven Solid Waste Management Units at HAFB granted by the NMED on November 29, 2005, no additional characterization or monitoring is required at LF-01."*

The NMED concurs with this recommendation. Therefore no long term monitoring (LTM) is required at this site at this time. Contamination in monitoring well S1-MW3 shall subsequently

be addressed by further investigation activities proposed by the Permittee at the adjoining site SS-02/SS-05.

2. SS-02 and SS-05 – POL Spill Sites 1 and 2 (AOC-T)

The LTM Report recommended the following: *“A Voluntary Corrective Measures (VCM) Report summarizing soil remediation, additional groundwater characterization, and risk evaluation will be submitted to NMED in support of a NFA recommendation.”*

The NMED concurs with this recommendation.

3. SD-08 – Refuse Collection Truck Washrack (SWMUs 4 and 82)

The LTM Report recommended the following: *“Manganese in wells MW-08-04 and MW-08-05 was the only contaminant detected above the NMGWQ Standard at SD-08 during the 2005 event. 1,2-Dichloroethane was detected in groundwater at MW-08-01 (73 µg/L) during the 2003 LTM event at a concentration greater than the NMGWQ Standard. This result was not confirmed during the 2005 event as the well was dry. SD-08 is recommended for closeout pending results of additional characterization to be performed in 2006.”*

The NMED concurs with this recommendation.

4. OT-16 – Former Entomology Shop Area (SWMUs 118 and 132 and AOC-A)

The LTM Report recommended the following: *“The 2005 LTM Program concluded the fifth sampling event for site OT-16, satisfying the commitment to 10 years of LTM. It is therefore recommended that LTM cease. Although three VOCs and two pesticides were detected, all three were below the NMGWQ Standards. Furthermore, these compounds were present in the upgradient monitoring well. Therefore, OT-16 is also recommended for no further action. A report summarizing the RFIs and LTM program for this site will be submitted to NMED to further support the NFA recommendation.”*

The NMED does not concur with this recommendation. Gamma-BHC (Lindane) was detected in monitoring well 118-MW1601 at a concentration of 0.2 µg/L. This concentration equals the US Environmental Protection Agency’s maximum contaminant level (**EPA MCL**) as per the National Primary Drinking Water Standards and, therefore, equals the standard set by the facility’s permit. It should be noted that Lindane has not been detected in this well since LTM sampling began in September 1997. NMED acknowledges that this well is presently hydrologically upgradient of the source area. However, due to the close well spacing and the very low flow gradient, seasonal groundwater fluctuations could account for this well’s groundwater being impacted by the source area. It should also be noted that total dissolved solids (**TDS**) concentrations in all wells at this site are below 10,000 mg/L.

Therefore, the Permittee is required to sample groundwater from all wells at this site for pesticides and TDS on a quarterly basis for eight consecutive quarters. The Permittee is required to submit a letter work plan confirming the scheduling of this sampling activity, including the methodologies to be used. This work plan shall be submitted within 30 days of the date of this letter. A decision on whether NFA status for this site is warranted will be made after the required quarterly sampling.

5. SS-17 – BX Service Station (AOC-Q)

The LTM Report recommended the following: *“Contaminated soil removal is underway and will be completed in 2008. Upon conclusion of this removal, a Voluntary Corrective Measures Report summarizing soil remediation, nature and extent of groundwater conditions, and risk evaluation will be submitted to NMED to support further decisions with regard to this site.”*

The NMED concurs with this recommendation.

6. LF-21 – West Area Landfill No. 2 (SWMU 116)

The LTM Report recommended the following: *“The 2005 LTM Program concluded its sixth sampling event for LF-21, representing over 10 years of LTM, satisfying the Decision Document commitment. Manganese detected in well MW-21-02 was the only contaminant detected above the NMGWQ Standards at LF-21 during the 2005 event. It is recommended that LTM cease. Supplemental characterization work is being performed this year in accordance with the July 2005 HydroGeoLogic RFI work plan, as amended in response to NMED comments, to support future decisions with regard to LF-21.”*

The NMED concurs with this recommendation.

7. LF-29 – Former Army Landfill (SWMU 104)

The LTM Report recommended the following: *“This round completes 10 years of LTM at LF-29 and it is recommended that LTM cease. Additional characterization work to support future decisions with regard to LF-29 is being performed this year in accordance with the July 2005 HydroGeoLogic RFI work plan, as amended in response to NMED comments.”*

The NMED concurs with this recommendation.

8. DP-30 and SD-33 – Grease Trap Disposal Pits (SWMU 113B)

The LTM Report recommended the following: *“Supplemental characterization work is being performed this year in accordance with the July 2005 HydroGeoLogic RFI work plan, as amended in response to NMED comments. This characterization includes continued groundwater sampling on a semi-annual basis for VOCs, metals and TDS.”*

The NMED concurs with this recommendation.

9. SS-39 – Missile Fuel Spill Area (SWMUs 165, 177, 179 and 181)

The LTM Report recommended the following: *“Supplemental characterization work is being performed this year in accordance with the July 2005 HydroGeoLogic RFI work plan, as amended in response to NMED comments. This characterization includes continued groundwater sampling on a semi-annual basis for VOCs, RCRA metals, perchlorate and TDS.”*

The NMED concurs with this recommendation.

10. SS-46 – JP-4 Spill Site (SWMU 130)

The LTM Report recommended the following: *“The 2005 LTM Program concluded the fifth sampling event for site SS-46 and 10 years of monitoring. It is recommended that LTM cease. Furthermore, VOCs were not detected above the CRDLs and SS-46 is recommended for No Further Action under NMED Criterion 5.”*

The NMED concurs with this recommendation.

11. SS-48 – Military Gas Station (AOC-N)

The LTM Report recommended the following: *“The 2005 LTM Program concluded the sixth sampling event for site SS-48 and over 10 years of LTM. Therefore, it is recommended that LTM cease. Although benzene was detected above the NMGWQ Standards in one monitoring well (S55-MW5), SS-48 is recommended for NFA. The TDS concentrations in four of the six wells were above 10,000 mg/L. It is hypothesized that the two wells with TDS concentrations below 10,000 mg/L are artificially low due to the dilution of natural groundwater from leaking water lines and surface irrigation from the domestic water supply. In conclusion, the NMGWQ Standard for TDS does not apply because SS-48 groundwater in its natural state would have TDS concentrations greater than 10,000 mg/L. Therefore, the groundwater is not a potential domestic or agricultural water supply.”*

The NMED does not concur with the recommendation that LTM cease and the site be considered for NFA status. Nor does the NMED agree with the conclusion that TDS concentrations in groundwater above 10,000 mg/L necessarily negate application of NM Water Quality Control Commission (NMWQCC) groundwater standards. Evaluation of potential risks from exposure pathways (e.g. vapor inhalation or construction worker exposure) will be deemed necessary for contaminants above NMWQCC Standards, regardless of TDS concentrations. The NMED also does not agree that the NMWQCC Standards do not apply to groundwater with TDS concentrations below 10,000 mg/L where this condition appears *“artificially low due to dilution*

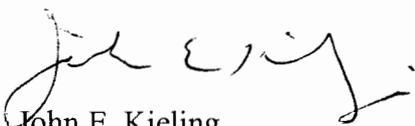
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of natural groundwater". If TDS concentrations are below 10,000 mg/L, the NMWQCC Standards will apply, regardless of hypothetical reasons for the lower concentrations.

The Benzene concentration in well S55-MW5 during this LTM event was 83 µg/L. The NMWQCC Standard is 10 µg/L. Benzene concentrations in this well have been above the NMWQCC Standard since September 1999. The TDS concentrations in this well during the 2005 LTM event were above 10,000 mg/L. In addition, the concentration of Methyl tertbutyl ether (**MTBE**) in well S55-MW5 was 419 µg/L and the MTBE concentration in well S55-MW7 was 161 µg/L. Although there are no NMWQCC Standards or EPA MCLs for MTBE in groundwater, the calculated standard as specified in the facility permit is 131 µg/L and the NM Environmental Improvement Board Standard for groundwater remediation is 100 µg/L (reference 20.5.12.1233 (a)(2) NMAC). These concentrations are exceeded in both wells. The TDS concentrations in these wells during the 2005 LTM event were above 10,000 mg/L. Therefore, the Permittee is required to conduct a risk assessment for volatile organic compounds, particularly Benzene and MTBE, evaluating the vapor inhalation and construction worker exposure pathways in the vicinity of this site. The Permittee is required to submit a letter work plan confirming the scheduling of this evaluation, including methodologies to be used. This work plan shall be submitted within 30 days of the date of this letter. A decision on whether NFA status or further LTM for this site is warranted will be made after the required risk assessment.

If you have any questions regarding this matter, please contact David Strasser of my staff at (505) 222-9526 or at the above address.

Sincerely,



John E. Kieling
Manager
Permits Management Program

JEK:dcs

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cc: J. Bearzi, 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: HAFB, 2006 and Reading
HWB-HAFB-06-003 (2005 LTM Report)
HWB-HAFB-05-003 (SD-08 RFI WP)
HWB-HAFB-05-004 (SS-02/SS-05 RFI WP)
HWB-HAFB-05-006 (LF-21, LF-29, DP-30/SD-33 and SS-39 RFI WP)