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RON CURRY
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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 27, 2006

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

RE: NOTICE OF DEFICIENCY: VOLUNTARY CORRECTIVE MEASURES WORK PLAN, SITE SS-61 (AOC 1001) SOIL REMEDIATION, AUGUST 2006 HOLLOWAN AIR FORCE BASE, EPA ID NO. NM6572124422 HWB-HAFB-05-007 AND HAFB-05-008

Dear Ms. Hartell:

The New Mexico Environment Department (NMED) has reviewed the referenced Voluntary Corrective Measures Work Plan (Work Plan), which was submitted in response to two previous Notices of Deficiency (NODs) dated January 27, 2006 and January 17, 2006, respectively, for the following documents: (1) *Monitored Natural Attenuation Report for SS-61 (AOC 1001)* dated June 2005 (HAFB-05-007) and (2) *Additional Groundwater Monitoring Work Plan for SS-61 (AOC 1001)* dated May 2005 (HAFB-05-008). The Work Plan cannot be approved at this time. Holloman Air Force Base (the Permittee) must address the following deficiencies before the Work Plan can be approved.

1. As previously stated, the Work Plan under review was submitted in response to two previous NODs. Although most of the NOD comments appear to have been addressed in the body of the Work Plan, no formal response to the individual NOD comments was provided.

To allow for an efficient and effective NMED review of the NOD responses, the Permittee is required to submit a stand-alone document that provides a response to each NOD comment as outlined in this letter and the past NOD letters. Where possible, rather

than duplicating information, the stand-alone document may refer to the section(s) in the Work Plan that address the NOD comments.

2. According to Figures 1-3, 1-5, 3-1 and 3-2 in the Work Plan, the southern boundary for site SS-61 terminates north of Building 1079. However, various documents submitted for this site refer to the possible presence of an oil/water separator at the southeast corner of Building 1079 and a concrete sump located at the northwest corner of Building 1079. Section 5.4 (Summary of the Nature and Extent of Contamination) of the *Phase II Remedial Investigation Report for SS-61* (December 2000) states that gasoline-related constituents were detected in groundwater south of Building 1079 and that these detections are likely the result of a past release from an oil/water separator formerly located at the southeast corner of Building 1079. In addition, a soil sample collected from 1-2 feet below ground surface in boring DP-40, collected during the Phase II Remedial Investigation in May 2000, showed a Total Petroleum Hydrocarbon (TPH) result of 7,800 mg/kg. This boring is located just southwest of Building 1079.

The NMED's January 27, 2006 NOD for the *Monitored Natural Attenuation Report for SS-61* (Comment #2) required that the Permittee submit a discussion on the possibility that the two aforementioned structures near Building 1079 could be a potential source of groundwater contamination at this site and to include a figure depicting the locations of these structures. This comment was not addressed in the Work Plan.

The Permittee is again required to submit this discussion and figure and to explain why the southern boundary of site SS-61 does not extend to a point south of Building 1079.

Regarding the elevated TPH soil sample result from boring DP-40, the Permittee is required to revise the additional investigation requirements of the Work Plan to include additional soil characterization for hazardous constituents in the vicinity (within 20 to 50 feet) of boring DP-40 to determine if this area is a potential source of groundwater contamination.

3. The NMED's January 17, 2006 NOD for the *Additional Groundwater Monitoring Work Plan for SS-61* (Comment #5) required that the Permittee ensure that laboratory Minimum Detection Limits (MDLs) for all constituents in groundwater be lower than the New Mexico Water Quality Control Commission (NMWQCC) standards or EPA Maximum Contaminant Levels, whichever is appropriate. Appendix C (Quality Assurance Project Plan Addendum) of the Work Plan under review presented Table 4-3 (Summary of Laboratory QC Limits). This Table does not show a Reporting Limit (RL/MDL) for 1,2-Dibromoethane (EDB) and shows a RL/MDL for benzo(a)pyrene at 5 µg/L. The NMWQCC standard for EDB is 0.1 µg/L and 0.7 µg/L for benzo(a)pyrene.

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The Permittee is again required to ensure that RLs/MDLs for all constituents are lower than the applicable standards and to submit assurances that this will be the case.

4. **Page 2-13, Section 2.5.5.1, Source Area Characterization, Abandoned Pipeline and Page 3-4, Section 3.2.2, DPT Soil Sampling**

These Sections state that organic vapor analyzer (OVA) readings will be collected during the advancement of each soil boring and that if the OVA reading is less than 50 parts per million, no soil samples will be collected for off-site analysis.

The Permittee is required to revise these Sections to show the collection of a minimum of one soil sample for off-site analysis from each soil boring, regardless of the OVA readings. The locations of sample collection shall be biased to areas with the greatest potential for contamination.

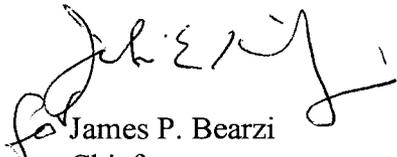
5. **Page 3-6, Section 3.2.4.1, Monitoring Well Locations and Figure 3-2**

This Section and Figure describe and show the location for two new monitoring wells to serve to delineate the downgradient horizontal extent of plume migration.

Based upon groundwater sampling results provided in previous reports, the Permittee is required to re-locate proposed monitoring well SS61-MW-14 to a location east of Building 1001, equidistant between Building 1001 and existing well SS61-MW-03. Proposed well SS61-MW-13 should then be moved to a point equidistant between existing wells MW29-03 and SS61-MW-07. The Permittee is required to revise this Section and Figure 3-2 accordingly.

Please respond to this Notice of Deficiency within sixty (60) calendar days of receipt of this letter. 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

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cc: J. Kieling, NMED HWB
W. Moats, NMED HWB
C. Amindyas, NMED HWB
D. Strasser, NMED HWB
D. Tellez, EPA, Region 6 (6PD-F)
G. Fish, HAFB
File: HAFB 2006 and Reading
HAFB-05-007 and HAFB-05-008