

HAFB 06

State of New Mexico
ENVIRONMENT DEPARTMENT



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RON CURRY
SECRETARY

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 12, 2006

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

**RE: NOTICE OF DEFICIENCY: TECHNICAL MEMORANDUM LETTER
REPORT, S1-MW3 SOURCE INVESTIGATION, AUGUST 2006
HOLLOMAN AIR FORCE BASE, EPA ID NO. NM6572124422
HWB-HAFB-06-005**

Dear Ms. Hartell:

The New Mexico Environment Department (NMED) has reviewed the referenced Source Investigation Report (Report) dated August 2006. The Report cannot be approved at this time. Holloman Air Force Base (the Permittee) must address the following deficiencies before the Report can be approved.

1. The Report included a compact disk which provided all soil and ground water laboratory result reports and Table 1 provided the minimum and maximum concentrations of volatile organic compounds (VOCs) detected in the ground water. However, no summary tables were presented to show all contaminant detections in soil and ground water. The Permittee is, therefore, required to submit summary tables showing all soil and ground water contaminant detections. These tables must include the following:
 - Sample ID numbers,
 - Soil sample depths,
 - Method detection limits,
 - Analytical results and units of measurement, and

- Corresponding soil screening levels (SSLs) and ground water standards, either New Mexico Water Quality Control Commission (NMWQCC) standards or standards established through the Permit.

2. Page 6 of 15, Section 4.1, 1st Paragraph, Soil Sampling Analytical Results

This paragraph states that the SSL for Total Petroleum Hydrocarbons (TPH)-Gasoline Range Organics (GRO) is not applicable since the primary chemicals of TPH-GRO (i.e. VOCs) are evaluated separately. The NMED does not agree with this assertion. TPH Screening Guidelines (November 2005) have been established by the NMED to ascertain if the residual level of petroleum in soil represents an unacceptable risk (e.g. vapor migration) to users of the site and/or provides a continuing source of ground water contamination.

The concentration of TPH-GRO in the soil at 15 feet below ground surface (bgs) in boring DP-21 was 1,200 mg/kg. The residential SSL for jet fuel (the contaminant of concern) is 940 mg/kg. In addition to this elevated TPH-GRO concentration, several other VOCs and semi-volatile organic compounds (SVOCs) were detected in this soil sample, albeit at concentrations less than the SSL. Therefore, the NMED considers the soil at this location (DP-21) to be a possible continuing source of ground water contamination. See Comment #4 for further requirements regarding this potential source.

3. Page 6 of 15, Section 4.2, Groundwater Sampling Analytical Results and Figure 3

This Section and Figure indicate that only concentrations of benzene, ethylbenzene and 1,2-dichloroethane were detected in ground water above NMWQCC Standards. The Permittee is advised that the following contaminants were also detected in ground water above standards:

Contaminant	Concentration (µg/L)	Well #	NMWQCC Standard (µg/L)	Standard Per Permit (µg/L)
Naphthalene	163	DP-21	30	
n-Propylbenzene	236	DP-21		96
1,2,4-TMB	231	DP-21		5
1,3,5-TMB	86	DP-21		5
1,2,4-TMB	19.4	DP-22		5
1,3,5-TMB	32.1	DP-22		5

The Permittee is required to revise this Section and Figure to indicate these exceedances.

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4. **Page 7 of 15, Section 5, Conclusions**

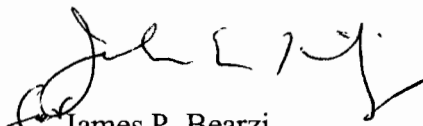
This Section indicates that all detected analytes in the soil were below the NMED SSLs and, therefore, a source area removal is not required. As per Comment #2 above, NMED does not necessarily agree with this assertion. In order to further characterize the potential contamination source area in the vicinity of boring DP-21, the Permittee is required to advance a minimum of two additional soil borings within twenty to forty feet of boring DP-21 to a depth of approximately twenty feet bgs. Soil samples are to be collected from a depth showing the highest level of contamination based on organic vapor analyzer readings and analyzed for TPH (full range), VOCs and SVOCs. The results of this additional characterization activity must be submitted along with the other responses to the Notice.

5. **Figures 1, 2, 3 and 4**

NMED requires that all site figures include a coordinate system (i.e., UTM, latitude/longitude) and the boundaries of the site must be shown on the figures. Coordinates of 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 within ninety (90) calendar days of receipt of this notice. 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

cc: J. Kieling, NMED HWB
W. Moats, NMED HWB
C. Amindyas, NMED HWB
D. Strasser, NMED HWB
D. Tellez, EPA, Region 6 (6PD-F)

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G. Fish, HAFB
File: ~~HAFB 2006 and Reading~~
HWB-HAFB-06-005