

RESPONSIVENESS - INTEGRITY - TEAMWORK

January 23, 2007

New Mexico Environment Department
Hazardous Waste Bureau
Permits Management Program
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303



Attention: Mr. John E. Kieling
Program Manager

Subject: Response to Notice of Deficiency: Additional Groundwater Monitoring Work
Plan for SS-61 (AOC 1001), May 2005, Holloman Air Force Base, EPA ID#
NM6572124422, HWB-HAFB-05-008.

Dear Mr. Kieling,

Enclosed please find tabulated responses to the subject Notice of Deficiency (HWB-HAFB-05-008). Upon verbal or written concurrence from NMED, Bhate will submit the changed pages to NMED.

If you have any questions, please feel free to call me at 303-815-1762.

Sincerely,
Bhate Environmental Associates, Inc.

A handwritten signature in cursive script that reads "Frank Gardner".

Frank Gardner, PG
Program Manager

cc w/ encl: C. Amindyas, NMED HWB
D. Strasser, NMED HWB
G. Fish, HAFB



Response to Comments
 Additional Groundwater Monitoring Work Plan
 for SS-61 (AOC 1001), May 2005
 Holloman AFB, NM

Comment No.	Section	Page	Comment	Response
Author	David Strasser		Date of Comments: January 17, 2006, Notice of Deficiency HWB-HAFB-05-008	Date of Response: December 20, 2006
1	1.0, 2 nd paragraph	1-1	In a letter from NMED dated February 4, 2005 (which prompted submittal of the subject work plan), the Permittee was advised that a separate plume of 1,1,2-trichloroethylene (TCE) might emanate from a possible source located to the east-southeast of the subject site's monitoring well MW-02. NMED required that the Permittee perform an additional investigation of the potential TCE plume. This paragraph of the work plan indicated that the TCE plume would be designated as a separate area of concern (AOC) and would receive separate funding for an investigation. Since no timetable for this action was provided, the Permittee must submit a tentative timetable for AOC designation and RCRA Facility Investigation work plan submittal to this Notice of Deficiency.	<p>Concur. During the previous investigations at SS-61, TCE was detected in monitoring well SS-61-MW02 above the US Environmental Protection Agency maximum contaminant level (5 µg/L). As a result, this separate plume of TCE that may be emanating from a possible source located east-southeast of monitoring well SS61-MW02 has been identified as the new Environmental Restoration Program (ERP) Site SS-73 (TCE Source Investigation East of SS-61). The location of SS-73 is an open area located approximately 150 feet east of the concrete pad that is part of Site SS-61.</p> <p>In May 2006 an abbreviated sampling plan was executed to collect preliminary data for the new ERP Site SS-73. The scope of this effort was to resample SS61-MW02 for VOCs and to install three temporary monitoring wells (two upgradient and one adjacent to the previous DP-20 sampling location). Additionally a soil sample was collected from each of these direct push technology (DPT) soil borings. VOCs were reported below the detection limits for all soil samples. TCE was reported in the groundwater from SS61-MW02 and DP03 (DP-20 location) at concentrations of 13.6 and 2.4 µg/L respectively.</p> <p>Additional characterization of Site SS-73 will be conducted as part of the RCRA Facility Assessment Multiple Sites Confirmatory Sampling Work Plan (scheduled for delivery to NMED in late 2006/early 2007).</p> <p>The reference that Site SS-73 has been designated as a separate site and that it will be evaluated under a separate work plan was included in introduction of the <i>SS-61 Voluntary Corrective Measures Work Plan</i>, Bhate, August 2006 (Section 1, page 1-1, 2nd paragraph, last sentence).</p>
2	2.1, and App. D,	2-1 and	This Section and Table indicate that only 10 field samples would be collected per sampling event. However,	Concur. This discrepancy was a typographical error, as 11 monitoring wells were proposed for groundwater sampling in the <i>Additional</i>

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	QAPP Addendum, Table 4-1	Table 4-1	<p>sampling of 11 monitoring wells is proposed.</p> <p>HAFB must provide clarification of this apparent discrepancy.</p>	<p><i>Groundwater Monitoring Work Plan for SS-61 (AOC 1001)</i>, Bhate, 2005.</p> <p>Fourteen existing wells (SS61-MW-02, SS61-MW-03, SS61-MW-05 to SS61-MW-10, SS61-MW-12, MW-29-02 to MW-29-05, and MW-29-08) and two new wells (SS61-MW-13 and SS61-MW-14) are scheduled to be sampled as part of the <i>SS-61 Voluntary Corrective Measures Work Plan</i>, Bhate, August 2006. The revised monitoring well groundwater sampling program is presented Section 3.2.5, page 3-7 of the <i>SS-61 Voluntary Corrective Measures Work Plan</i>, Bhate, August 2006.</p>
3	2.1	2-1	<p>This Section indicates that monitoring wells MW-04 was added to the monitoring program. Do to this well's close proximity to MW-06 and its historically low levels of contaminants. This well shall be deleted from the monitoring program and replaced with monitoring well MW-07 to provide monitoring of the western periphery of the plume. This is in addition to the other 10 wells to be monitored.</p> <p>This Section also indicates that the monitoring wells will be sampled twice per year for two years. In order for the NMED to consider MNA as a viable corrective measure at this site, HAFB is required to conduct quarterly sampling and reporting for a two-year period.</p>	<p>Concur. As noted in the response to Comment Number 2 (see above), monitoring well SS61-MW-04 has been deleted from the monitoring program and replaced with SS61-MW-07 in the list of wells scheduled for groundwater sampling as part of the <i>SS-61 Voluntary Corrective Measures Work Plan</i>, Bhate, August 2006 (Section 3.2.5, page 3-7).</p> <p>As monitored natural attenuation (MNA) is no longer considered a viable corrective measure, HAFB proposes only one round of sampling in conjunction with petroleum contaminated soil source removal action as presented in the <i>SS-61 Voluntary Corrective Measures Work Plan</i>, Bhate, August 2006.</p>
4	3.0	3-1	<p>This Section indicates that Monitoring Reports would be submitted, but it does not indicate when the reports will be submitted.</p> <p>HAFB is required to submit quarterly Monitoring Reports for the two-year sampling cycle, prepared in accordance with NMED's Position Paper entitled "General Reporting Requirements for GW Monitoring". The paper is located</p>	<p>Comment noted. As MNA is no longer considered a viable corrective measure at SS-61 quarterly sampling for the two-year sampling cycle is not included as part of the <i>SS-61 Voluntary Corrective Measures Work Plan</i>, Bhate, August 2006.</p>

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			on the NMED Hazardous Waste Bureau (HWB) website at http://www.nmenv.state.nm.us/hwb/guidance.html .													
5	App. D	Table 4-2	<p>Table 4-2 provides the Estimated Quantitation Limits (EQLs), not Method Detection Limits (MDLs), for the various constituents to be sampled. The following constituents have EQLs that are higher than the groundwater quality standards established by the NM Water Quality Control Commission (NMWQCC):</p> <table border="1"> <thead> <tr> <th>Constituent</th> <th>EQL (µg/L)</th> <th>NMWQCC Std (µg/L)</th> </tr> </thead> <tbody> <tr> <td>1,2-Dibromoethane (EDB)</td> <td>5</td> <td>0.1</td> </tr> <tr> <td>Vinyl Chloride</td> <td>5</td> <td>1</td> </tr> <tr> <td>Benzo(a)pyrene</td> <td>10</td> <td>0.7</td> </tr> </tbody> </table> <p>The Permittee must ensure that the MDLs for these and all constituents will be lower than the NMWQCC Standards. Note also that the MCL for EDN is 0.00005 mg/L.</p>	Constituent	EQL (µg/L)	NMWQCC Std (µg/L)	1,2-Dibromoethane (EDB)	5	0.1	Vinyl Chloride	5	1	Benzo(a)pyrene	10	0.7	<p>Concur. Estimated Quantitation Limits have been replaced with Reporting Limits in Table 4-3, <i>Summary of Laboratory QC Limits</i> found in the Quality Assurance Project Plan Addendum (Appendix C) of the <i>SS-61 Voluntary Corrective Measures Work Plan</i>, Bhate, August 2006.</p>
Constituent	EQL (µg/L)	NMWQCC Std (µg/L)														
1,2-Dibromoethane (EDB)	5	0.1														
Vinyl Chloride	5	1														
Benzo(a)pyrene	10	0.7														
6			<p>The November 2003 Feasibility Study Work Plan for Spill Site SS-61 indicated in Section 4.1.2, Groundwater Sampling Schedule, that monitoring well MW-03 would be monitored weekly for the presence of free product for a period of one year. There is no indication in subsequent reports that this monitoring was ever conducted.</p> <p>If this monitoring was conducted, the Permittee is required to provide the data and a discussion regarding the results. If it was not conducted, the Permittee is required to conduct this monitoring for a period of one year and provide the results in the quarterly monitoring reports. In the event that more than 1/8-inch of free product (not-aqueous phase liquid) is discovered during a monitoring event, the Permittee must notify the NMED within five calendar days.</p>	<p>Monitoring well SS61-MW03 was monitored weekly for the presence of free product using an interface probe from April to June 2004. Free product was not encountered during these sampling events. This information has been included at the 7th bullet in Section 2.4, p 2-10 of the <i>SS-61 Voluntary Corrective Measures Work Plan</i>, Bhate, August 2006. These weekly measurements are included in the table titled "<i>Weekly Monitoring of MW-03 at SS-61</i>" that has been included in Appendix A-4 of the <i>SS-61 Voluntary Corrective Measures Work Plan</i>, Bhate, August 2006.</p>												

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