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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

March 30, 2007

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

**RE: NOTICE OF DEFICIENCY: ACCELERATED CORRECTIVE MEASURES  
WORK PLAN, MULTIPLE SITES, NOVEMBER 2006  
HOLLOMAN AIR FORCE BASE, NM6572124422  
HAFB-07-001**

Dear Ms. Hartell:

The New Mexico Environment Department (NMED) has reviewed the November 2006 *Accelerated Corrective Measures Work Plan, Multiple Sites* (Work Plan) addressing the following Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) at Holloman AFB (the Permittee): SWMU 114 (OT-03), SWMU 113A (OT-20), SWMU PRI-A (OT-32), SWMU PRI-2/5 (OT-35), SWMU 137 (SS-38), AOC-O (OT-45), AOC-R (SS-06), AOC-K (SS-12), AOC-H (SS-18), SWMU 111 (RW-42) and AOC-L (OT-37). The Permittee must address the following deficiencies before NMED can make a final determination regarding approval of the Work Plan.

**1. Page 1-1, Section 1, Introduction, 2nd Paragraph, Last Sentence**

This sentence references Environmental Restoration Program (ERP) site number OT-38. Table A of the Permit (List of SWMUs Requiring Corrective Action) shows the ERP number for this site as SS-38 (SWMU 137). The Permittee must clarify this discrepancy.

**2. Page 3-2, Section 3.1.1, OT-20 Sewage Lagoon Disposal Trenches**

This section states that additional characterization activities at ERP site number OT-20 (SWMU 113A) would include trenching activities, the installation of up to nine soil borings, and the installation of three monitoring wells as shown on Figure 3-1. During NMED's March 8, 2007 site inspection it was agreed that the proposed trenching was not required. Rather, a minimum of three additional exploratory soil borings would be advanced to more accurately define the eastern boundary of the source areas prior to excavation. Soils shall be analyzed as proposed. The installation of the three monitoring wells and ground water sampling and analysis is also required as proposed.

The Permittee is therefore required to submit an amendment to the work plan for this site that shows the anticipated boundary of the source areas and the locations and proposed depths of the new borings.

**3. Page 3-6, Section 3.1.4.1, OT-45 DPT Soil Borings**

This section states that additional characterization activities at ERP site number OT-45 (AOC-O) would include the installation of up to fifteen soil borings as shown on Figure 3-4. During NMED's March 8, 2007 site inspection it was agreed that the number of borings could be reduced to nine borings in the locations that were identified during the inspection. Soils and the ground water sampling and analysis is also required as proposed.

The Permittee is therefore required to submit an amendment to the work plan for this site that shows the anticipated boundary of the source area and the locations and proposed depths of the new borings.

**4. Page 3-6, Section 3.1.5.1, SS-12 DPT Soil Borings**

This section states that additional characterization activities at ERP site number SS-12 (AOC-K) would include the installation of up to fifteen soil borings as shown on Figure 3-5. During NMED's March 8, 2007 site inspection it was agreed that the proposed number of borings could be reduced to allow for boring spacing of 25 to 30 feet along the west/east trending storm sewer commencing in an easterly direction from boring BH-12-06A. The most easterly boring should be moved to the east approximately 25 feet from its proposed location. The north/south trending borings along the JP-4 pipeline are acceptable as proposed. Soils and ground water sampling and analysis is required as proposed.

The Permittee is therefore required to submit an amendment to the work plan for this site that shows the anticipated boundary of the source area and the locations and proposed depths of the new borings.

Ms. Debbie Hartell  
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5. **Page 3-8, Section 3.1.7, RW-42 Radioactive Waste Burial Site**

This section states that additional characterization activities at ERP site number RW-42 (SWMU 111) would include the installation of four borings and three monitoring wells as shown on Figure 3-6. In addition to this characterization activity, the Permittee is required to conduct a surface radiological survey prior to commencing site activities, and to include these results and the results of any historical radiological surveys conducted at the site in the final report.

6. **Page 3-9, Section 3.1.8, OT-37 Early Missile Testing Site**

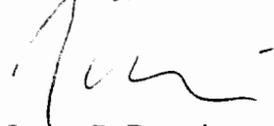
This section proposes various soil and ground water characterization activities at four locations within ERP site number OT-37 (AOC-L). In addition to the proposed characterization activities, the Permittee is required to collect a surface sample of the tar-like substance that coats the surface in the vicinity of the inclined test track and analyze this sample for total polychlorinated biphenyls (PCBs).

7. **Page 5-2, Section 5.1.3, Excavation Confirmation Sampling**

This section proposes that confirmatory samples will only be collected from excavation sidewalls, and not the bottom of the excavations, because the excavations will be terminated below the water table. At sites where this is not the case, samples must be collected from the bottoms of the excavations using the same dimensional and analytical requirements of the sidewalls.

The Permittee must respond to this Notice of Deficiency within thirty (30) 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

Ms. Debbie Hartell

March 30, 2007

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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)  
File: HAFB 2007 and Reading  
HAFB-07-001