



ENGINEERING, SCIENCE AND CONSTRUCTION

HAFB

445 Union Blvd, Suite 129, Lakewood, CO 80228  
303-815-1762 main 303-815-1763 fax www.bhate.com

RESPONSIVENESS - INTEGRITY - TEAMWORK

April 3, 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: Accelerated Corrective Measures Work Plan  
for Multiple Sites, November 2006, Holloman Air Force Base, New Mexico,  
NM6572124422, HAFB-07-001.

Dear Mr. Kieling,

Bhate Environmental Associates, Inc. (Bhate) is pleased to submit the above referenced responses to comments for your review and comment.

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

Sincerely,  
Bhate Environmental Associates, Inc.

Frank Gardner, PG  
Program Manager

Cc w/ enclosure:

David Strasser (NMED HWB)



**RESPONSE TO COMMENTS**  
**Accelerated Corrective Measures Work Plan**  
**Multiple Sites**  
**Holloman AFB, New Mexico**

COMMENT NO.	SECTION	PAGE	COMMENT	RESPONSE
<b>AUTHOR:</b>	Mr. David Straesser (USACE Omaha)		Date of Comments: March 30, 2007.	Date of Response: April 3, 2007
<b>DOCUMENT:</b>	ACM Work Plan Multiple Sites			
1	1.0, Introduction, 2nd Paragraph, Last Sentence	1-1	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.	Although Table A of the Holloman AFB RCRA Permit (NM6572124422) lists SWMU 137 as ERP Site "SS-38", the <i>Holloman Air Force Base Environmental Restoration Program, Management Action Plan, December 2004</i> lists SWMU 137 (Sled Test Maintenance Area) as "OT-38". In addition, this site consists of an abandoned cesspool behind the building and is not considered a historical spill site (SS). Therefore, the ERP Site ID will be changed to "OT-38" during the next modification of the HAFB RCRA Permit.
2	3.1.1 OT-20 Sewage Lagoon Disposal Trenches	3-2	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 area and the locations and proposed depths for the new borings.	Concur. The scope of work presented in Section 3.1.1 has been revised. The additional trenching has been deleted and the installation of nine soil borings has been reduced to three soil borings. The purpose of the three soil borings (advanced 7 to 10 ft below ground surface) is to confirm the locations of the three sewage grit disposal pits and to assist in defining the eastern boundary of the disposal pits prior to excavation. The soil will be analyzed as proposed and the installation of three monitoring wells and ground water sampling will also be completed as proposed. Figure 3-1 has been revised to show the locations of the three boreholes and Figure 4-1 shows the anticipated boundary of the source area(s) excavation.
3	3.1.4.1 OT-45 DPT Soil Borings	3-6	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.	Concur. The scope of work presented in Section 3.1.4.1 (OT-45 DPT Soil Borings) has been revised. The installation of fifteen soil borings has been reduced to the nine locations that were identified during the site inspection (March 8, 2007). Figure 3-4 has been revised to show the locations of the nine OT-45 soil borings. It is anticipated that the nine soil boring will be advanced to a depth of approximately 5 feet below ground surface (anticipated depth to ground water). In addition, the OT-45 source area boundary has been extended around the locations of the three former underground storage tanks, the former pump island and former fuel station (Figure 3-4). The soil and ground water analysis will be analyzed as proposed.

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COMMENT NO.	SECTION	PAGE	COMMENT	RESPONSE
4	3.1.5.1 SS-12 DPT Soil Borings	3-6	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 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 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.	Concur. The scope of work presented in Section 3.1.4.1 (SS-12 DPT Soil Borings) has been revised. The installation of up to fifteen soil borings has been reduced to twelve locations. It was agreed during NMED's March 8, 2007 site inspection that the proposed number of borings could be reduced to allow for a boring spacing of 25 to 30 feet along the east/west trending storm sewer commencing in an easterly direction from BH-12-06A. It is anticipated that the twelve soil borings will be advanced to a depth of approximately 5 to 7 feet below ground surface (anticipated depth to ground water). Figure 3-5 has been revised to show the locations of the twelve SS-12 DPT soil boring locations and the approximate source area/site boundary.
5	3.1.7 RW-42 Radioactive Waste Burial Site	3-8	This section states that additional characterization activities at ERP site number RW-42 (SWMU 111) would include the installation of four soil 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.	Concur. A surficial radiological survey will be conducted prior to initiating field activities at Site RW-42. The results of this and historical radiological surveys will be included in the final report for the site.
6	3.1.8 OT-37 Early Missile Testing Site	3-9	This section proposes various soil and groundwater characterization activities at four locations within ERP site OT-37 (AOC-L). In addition to the proposed characterization activities, the Permittee is required to collect a surface sample of the tarlike substance that coats the surface in the vicinity of the inclined test track and analyze the sample for total polychlorinated biphenyls (PCBs).	Concur. A single sample of the tarlike substance that coats the surface in the vicinity of the inclined test track will be collected and analyzed for total polychlorinated biphenyls.
7	5.1.3 Excavation Confirmation Sampling	5-2	This section proposes that confirmation 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.	Concur. For sites (e.g., OT-03) where contaminated soil excavation is most likely to be terminated above the water table, confirmation soil samples will also be collected from the bottom of the excavation using the same dimensional and analytical requirements as the sidewall confirmation sampling. This change has been added to Section 5.1.3 (Excavation Confirmation Sampling).
END OF COMMENTS				