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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

June 11, 2007

Debbie Hartell, Chief
Environmental Flight
49th CES/CEV
550 Tabosa Avenue
Holloman AFB, NM 88330-8458

**RE: NOTICE OF DEFICIENCY: RCRA FACILITY ASSESSMENT,
CONFIRMATORY SAMPLING WORK PLAN, MULTIPLE SITES
JANUARY 2007
HOLLOMAN AIR FORCE BASE (HAFB), EPA ID# NM6572124422
HWB-HAFB-07-002**

Dear Ms. Hartell:

The New Mexico Environment Department (NMED) has reviewed the Holloman Air Force Base's (the Permittees) document entitled *RCRA Facility Assessment Confirmatory Sampling Work Plan, Multiple Sites*, dated January 2007 (Work Plan). The Work Plan addresses the following Areas of Concern (AOCs): AOC-B (SS-65), AOC-C (SS-66), AOC-E (SS-67), AOC-F (SS-68), AOC-I (SS-69), AOC-M (RW-70) and AOC-S (TU-71). It also addresses Environmental Restoration Project (ERP) Sites SS-72 and SS-73. The Permittee must address the following deficiencies before NMED can make a final determination regarding approval of the Work Plan.

1. The Permittee must seek to modify its RCRA permit to add ERP Sites SS-72 and SS-73 to Table A of the permit which lists sites requiring corrective action. The Permittee must submit a request for a Class 1 permit modification within 60 days of receipt of this letter. In the request, the Permittee must include all of the necessary information to support a Class 1 permit modification in accordance with 40 C.F.R. § 270.42(a).

2. At Site SS-72, the Permittee proposes to install three groundwater sampling points to collect groundwater samples. The Permittee should discuss in this Work Plan the option to install permanent monitoring wells if contamination is detected.
3. According to Figure 9-2 in the *Final 2005 Long-Term Groundwater Monitoring Report*, localized groundwater at Site SS-73 may flow in a more northerly direction. To investigate a possible source of contamination to SS61-MW02, the Permittee must locate two additional soil borings/groundwater sampling points at Site SS-73. One will be located south of buildings 1085 and 1088 and one will be located north of buildings 1085 and 1088. Soil and groundwater samples shall be analyzed as proposed in the Work Plan.
4. At Site SS-73, spills may have occurred during former gasoline fueling operations. It is possible that total petroleum hydrocarbons may have been released and were a source of contamination. In addition to volatile and semi-volatile organics, the Permittee must analyze all proposed soil and groundwater samples for total petroleum hydrocarbons that include gasoline range organics (GRO) and diesel range organics (DRO).
5. At Site SS-65, there is little information concerning the type, size, location, and extent of the surface spill. From the description provided, the adjacent building may have been a storage facility, instead of a bathroom as stated in the Work Plan. The observed oil and grease staining may be a result of leaks during storage. The proposed borehole is not sufficient to determine the presence of contaminants in this area because there are many uncertainties associated with this site, such as location and extent of supposed surface spill and past operational practices. The Permittee must install a total of three borings to the depth of groundwater and collect samples as proposed in this Work Plan. The borings should be located within 25 feet of the building and to the north of the building. If contamination is detected in the soil, the Permittee must install one groundwater sampling point in the boring with the highest apparent contamination and collect a groundwater sample for analysis as proposed in this Work Plan.
6. Site SS-66 is titled *Building 835 Spills*. The 1996 aerial photo depicts two distinct concrete pad areas with oil stains approximately 25 feet apart. One borehole will not serve to reduce the uncertainty of a release from both of these locations. The Permittee must install one boring at each of these identified spill areas. Because surface runoff from any release that occurred on these concrete pads had the potential to contaminate the surrounding soil, the Permittee must install one boring north of these areas as well. All borings will be drilled to the depth proposed in this Work Plan. If contamination is detected in the soil, the Permittee must install one groundwater sampling point in the boring with the highest apparent contamination and collect a groundwater sample for analysis as proposed in this Work Plan.

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7. The Permittee must provide information on the contents of the quenching bath oils at Site SS-66. Specifically, NMED is concerned that cyanide may have been used in the process. If so, the Permittee must also sample the soil and groundwater for cyanide.
8. The Work Plan states that, at Site SS-67, "an area just south of Building 905, near a telephone pole, was observed to have black colored grit over a surface area of approximately 6 x 6 feet. This black material is similar to the description of the sandblasting debris described in the 1988 RFA." This recent (July 12, 2006) observation indicates the waste piles were not completely removed as reported. The Permittee must remove the remaining sandblasting debris from the ground surface and collect surface and subsurface soil samples in this area to determine the extent of contamination. Soil samples must be analyzed for Target Analyte List metals. If contamination remains above NMED soil screening levels (SSLs), the soil must be removed until SSLs are achieved.
9. At Site SS-67, the Work Plan indicates that field screening will be performed on the soil samples. Given the history of operations at this site, the potential contaminants of concern are metals and other constituents found in paints. NMED recommends the Permittee not use field screening to determine sample locations. Following removal of the sandblasting debris, the Permittee must collect soils samples from the 0-6 inch interval and from the two-foot depth. The Permittee must also install two boreholes outside of each building (903 and 905). The Permittee must analyze the samples as proposed in this Work Plan.
10. As part of its investigation-derived waste management, the Permittee proposes to spread sediment remaining in the decontamination pad area on the ground. NMED requires that the Permittee containerize its investigation-derived waste (sediment) from the decontamination area and manage it accordingly based on analytical data.
11. As part of its general decontamination procedures, the Permittee proposes to allow decontamination water to evaporate or to dispose of it at the HAFB wastewater treatment plant. NMED requires that all liquid waste, including decontamination water and purge water, be containerized until characterization is performed and proper disposal is arranged. The waste may be characterized based on known or suspected contaminants. NMED recommends a dry decontamination method be used prior to wet decontamination. In this method, equipment is brushed with a wire or other suitable brush, if practicable and necessary, to remove large particles.
12. The Permittee must revise Table 3-1 (Analytical Methods and Number of Samples by Site) to reflect the number of samples required in the aforementioned comments.

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13. The Permittee has included the scope of services as an appendix to this Work Plan. This appendix is intended to provide guidance to the contractors performing the work. As such, it should not be an appendix to a work plan that is subject to approval by a regulatory authority and should be removed.

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 Darlene Goering of my staff at (505) 222-9504 or (505) 476-6042.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

cc: J. Kieling, NMED HWB
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File: HAFB 2007 and Reading
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