

HAFB07



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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

June 26, 2007

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

**RE: NOTICE OF DEFICIENCY
REQUEST FOR NO FURTHER ACTION, OT-44 (AOC-P), JANUARY 2007
HOLLOMAN AIR FORCE BASE, EPA ID# NM6572124422
HWB-HAFB-07-004**

Dear Ms. Hartell:

The New Mexico Environment Department (NMED) has reviewed Holloman Air Force Base's (the Permittee) document entitled *Request for No Further Action, OT-44 (AOC-P)*, dated January 2007 (Request). The Permittee must address the following comments before NMED can make a final determination regarding the request.

1. In Section 3.3.2.1, the Permittee states that “[g]roundwater RI Stage I analytical results are presented in Table 3.4.” Except for the TRPH value of 17 parts per million (ppm) in MW2, the data discussed in this paragraph are not presented in Table 3.4. The Permittee must revise and resubmit the table to include all Phase II Stage I groundwater analytical results.
2. In Section 3.3.7 (Final Closure Report Addendum), the Permittee states that “the excavation activities were conducted in an area where vadose zone soils contained TRPH concentrations above the former TPH action level of 1,000 mg/kg based on previous soil sampling activities.” The Permittee must revise and resubmit this section to address the fact that the excavation did not include some areas where concentrations of oil and grease in soil collected at or below the water table were well above NMED’s residential and

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industrial soil screening levels. Specifically, the oil and grease concentrations at sampling locations 50B1 (1,192 ppm at 5 feet and 4,265 ppm at 7.5 feet) and OT44-DP2 (19,100 ppm at 5 feet and 12,600 ppm at 6 feet).

3. In Section 3.3.8, the Permittee states that “[i]n the NMED 2001 LTM report comment response letter, dated February 24, 2003, NMED had no comment on the proposed cessation of LTM activities at OT-44 (AOC P). Consequently, LTM activities at OT 44 ceased.” This is incorrect. On page 3 of NMED’s comment response letter, its states that “NMED concurs with the recommendation to discontinue long-term monitoring at OT-44 due to no VOCs detected during the last sampling event.”
4. Table 3.6 (Soil Analytical Results, Additional Soil Characterization Activities) presents the TRPH data in $\mu\text{g}/\text{kg}$ units while Figure 3.2 presents the data in mg/kg units. The Permittee must correct and resubmit the table to be consistent with the figure and the laboratory reports.

NMED concurs with the Permittee’s conclusions and recommendations for OT-44 (AOC P). The recommendation is a no further action under NMED criterion 5. However, the Permittee must respond to the comments provided in this letter prior to initiating a Class 3 modification to its permit.

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.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

cc: J. Kieling, NMED HWB
W. Moats, NMED HWB
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