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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 13, 2007

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

**RE: NOTICE OF DEFICIENCY ON SWMU ASSESSMENT REPORT, HOLLOMAN
AIR FORCE BASE SEPTIC TANKS, APRIL 2007
HOLLOMAN AIR FORCE BASE, NM6572124422
HWB-HAFB-07-005**

Dear Ms. Hartell:

The New Mexico Environment Department (NMED) has reviewed the April 2007 Solid Waste Management Unit (SWMU) Assessment Report (SAR), *Holloman Air Force Base Septic Tanks*, submitted by Holloman Air Force Base (the Permittee). This document was submitted in response to an August 30, 2006 request by the NMED to locate and describe septic systems base-wide to allow the NMED to determine which, if any, systems require further investigation as possible SWMUs. NMED has the following general and site specific comments, including requirements for further investigation.

GENERAL COMMENTS

1. Active Systems

The SWMU Assessment Report (SAR) lists twenty five (25) active septic systems located throughout the base. NMED concurs that no investigations are currently required at these sites. However, NMED must be notified ninety days before any of these systems are deactivated or removed so that a determination can be made if investigation of any of

these systems is required.

2. **Inactive and Removed Systems**

The Permittee must confirm that all sites still in use with inactive or removed septic systems have been connected to the base waste water treatment system and provide the dates of the connections.

3. **Removed Systems**

The Permittee must submit copies of any field notes, reports and/or sampling results associated with the removal of the septic systems that show that these systems were removed in accordance with the NMED Liquid Waste Regulation, 20.7.3.307 NMAC. These submittals must provide information indicating that any potential source of hazardous constituent contamination does not remain. Based on this documentation, NMED will determine whether any of the sites with removed septic systems are appropriate for no further action or subject to further investigation requirements.

4. **Early Missile Test Site, AOC-L (OT-37) and High-Speed Test Track**

This Early Missile Test Site was not listed as a site that historically used septic systems. Also, with the exception of sites at the extreme southern end of the High-Speed Test Track, no sites along the track or in the vicinity of the track were listed as historically using septic systems.

The Permittee is required to confirm whether or not these sites historically used septic systems and, if so, provide the required background information.

5. **Septic System Leachfields**

The SAR did not include any information regarding the potential for leachfields to be located adjacent to the septic tanks. Leachfields are a potential point of discharge for any hazardous constituents discharged into the septic tank.

For all of the sites for which the NMED is requiring further investigation, all leachfields and distribution lines associated with inactive septic tanks must be located and placed on a map. For all inactive septic system sites where the locations and depths of the septic tanks and leachfield distribution lines are unknown, the Permittee shall excavate a portion of the tank and leachfield for purposes of determining any needed soil sample locations and depths. Where needed, leachfield investigations shall include an array of NMED-approved sampling locations (usually not less than three) with samples typically collected at the bottom and at five feet below the bottom of distribution lines.

6. Sumps and Floor Drains

The SAR did not include any information regarding the existence or locations of any sumps or floor drains that may drain into septic systems.

For all of the sites for which the NMED is requiring further investigation, all floor drains and sumps that drain into the septic system must be located and a description of contaminants of potential concern that could have been discharged into the drains must be provided (see next comment).

7. Contaminants of Potential Concern

The SAR did not include any information regarding the contaminants of potential concern at septic system sites.

For all of the sites for which the NMED is requiring further investigation, the Permittee must submit a description of past and present activities and a list of contaminants of potential concern (COPCs) for each site. Site investigation and sampling will be based on knowledge of past and present processes/activities at each site from which a list of COPCs is developed. The list of COPCs is the minimum list of analytes for which the Permittee intends to collect environmental samples to be submitted for laboratory analysis.

8. Report Maps

The maps provided in the SAR are deficient. For all of the sites for which the NMED is requiring further investigation, maps provided in the investigation reports must be to scale and include:

- a. A base-wide site map so that the reader can accurately locate the subject site.
- b. A coordinate system (i.e., UTM, latitude/longitude) and the boundaries of the site shown on all site maps.
- c. A north arrow.
- d. The locations of the septic tanks, sumps, floor drains, distribution lines and leachfields.
- e. Any proposed sample locations must be shown accurately.

9. RCRA Facility Investigation Work Plans and Reports

For all of the sites for which the NMED is requiring further investigation, RCRA Facility Investigation (RFI) work plans must be submitted in accordance with Part 4, Section IV.E.1. of the Hazardous Waste Facility Permit. A work plan may be submitted for each individual site or all sites may be included in one work plan. Upon completion of the investigation, the Permittee must submit a final RFI Report in accordance with Part 4, Section IV.E.3. of the Hazardous Waste Facility Permit.

Site Specific Comments (All Inactive Systems)

10. Building 308

Before a decision can be made as to whether or not further investigation of this site is necessary, the Permittee is required to provide a description of the processes involved in the historic weapons calibration operations. For example, solvent use and, if so, what type(s) should be able to be determined from these descriptions. The Permittee is also required to provide a general description of the types of aircraft support equipment currently stored in the building.

In addition, Permit Table B (summary of SWMUs not requiring corrective action) lists Building 308 as SWMU 51, *Building 308 Waste Accumulation Area*. The Permittee is required to explain why this site was considered a waste accumulation area. According to the Table, the U.S. Environmental Protection Agency listed the site in 1988 as a SWMU with no further action required.

11. Buildings 920, 921 922 and 924

Permit Table B (summary of SWMUs not requiring corrective action) lists Buildings 920 through 924 as SWMU 134, *Buildings 920-924 Drainage Ditch*. This SWMU was granted No Further Action (NFA) status by the NMED in February 2001. Before a decision can be made as to whether or not further investigation of this site is necessary, the Permittee is required to explain why this site was considered a SWMU and what was done to achieve NFA status. This can be done by submitting the Statement of Basis for the NFA decision or by providing a brief explanatory discussion.

In addition, the Permittee's recently submitted document providing maps of the Base's monitoring wells shows monitoring wells MW24-01, MW24-03, MW24-05 and MW24-06 in the vicinity of these buildings. The Permittee is required to provide the results of all sampling and analysis activities associated with these wells. Also, the January 2003 Base aerial photomap showing the locations of Basewide restoration sites depicts site OT-24 immediately south of Building 924. Site OT-24 is not listed on the Permit Tables summarizing SWMUs. The Permittee is therefore required to provide a description of site OT-24, including a summary of all activities at this site and COPCs.

Regarding Building 924, the SAR indicates that this building was used for maintenance of radar tracking equipment. Before a decision can be made as to whether or not further investigation of this site is necessary, the Permittee is required to provide a description of the processes involved in the radar equipment maintenance operations. For example, solvent use and, if so, what type(s) should be able to be determined from these descriptions.

12. Building 1091

This septic system serviced a now demolished air traffic control tower. Therefore, no further investigation of this site is necessary.

13. Building 1097

This septic system services a radio transmission facility. Therefore, no further investigation of this site is necessary.

14. Building 1190

This building was demolished in 2002, and it appears that the septic system is still in place. The SAR did not provide a description of the lavatory facilities or drains that discharged into the septic system. The history of the building provided in the SAR indicates that it was historically used for unconventional fuels testing and storage and included a shop, a laboratory and dressing rooms.

Because this building was associated with unconventional fuels storage and testing, the Permittee is required to submit a RFI work plan (see General Comments #8 and #9) to locate the inactive septic system, including any sumps and/or floor drains, the leachfield and the distribution lines (see General Comment #5), and develop a list of COPCs that may have discharged into the system (see General Comment #7). NMED believes COPCs should include total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs) and metals (Target Analyte List or TAL). Based on the locations and depths of the septic system components, the Permittee shall include in the work plan soil sampling and analysis in accordance with General Comments #5 and #7. As there is no evidence that the septic tank has been emptied, a sample of the contents of the tank, if any, shall be collected and analyzed for the COPCs to be analyzed for in the leachfield and distribution line soils. A RFI Report prepared in accordance with General Comment #9 must then be submitted to present the results of the site characterization.

15. Building 1194

The history of the building provided in the SAR indicates that it was historically used for missile assembly and test activities and unconventional fuels storage. It appears that the septic system is still in place.

Due to the fact that this building was associated with missile assembly and test activities and unconventional fuels storage, the Permittee is required to investigate the site as required in Comment #14 above.

16. Building 1196

Before a decision can be made as to whether or not further investigation of this site is necessary, the Permittee is required to provide a description of the processes involved in the historic missile assembly operations in this building. For example, solvent use and, if so, what type(s) should be able to be determine from these descriptions.

17. Building 1199

The history of the building provided in the SAR indicates that it was historically used as a rocket fuel laboratory. It appears that the septic system is still in place.

Due to the fact that this building was used as a rocket fuel laboratory, the Permittee is required to investigate the site as required in Comment #14 above.

18. Buildings 1200 and 1201

Permit Table A (summary of SWMUs requiring corrective action) lists the locations of these buildings as part of SWMU PRI-A (OT-32), *Primate Research Lab Sewer Line*. This SWMU is part of a multi-site Accelerated Corrective Measures (ACM) Work Plan submitted to the NMED in November 2006 and approved by the NMED on April 24, 2007. According to the ACM Work Plan, approximately 3,000 – 4,000 feet of the sewer line leading from the area of the former Primate Research Institute (PRI) was corroded and portions had collapsed. The work plan indicates that solvents and tritium tracers were used at the PRI and may have been discharged during the sewer line collapse. The work plan proposes further soil and groundwater sampling along the sewer line for VOCs, SVOCs, TPH, TAL metals and tritium.

The SAR did not provide a description of the lavatory facilities or drains that discharged into the septic system. The history of the buildings provided in the SAR indicates that they were historically used as space biology laboratories where animal experiments were conducted. It appears that the septic systems are still in place.

The Permittee is therefore required to investigate the sites as required in Comment #14 above, with the addition of tritium to the list of COPCs.

19. Building 1219

This septic system services administrative offices. Therefore, no further investigation of this site is necessary.

20. Building 1221

The history of the building provided in the SAR indicates that it was historically used for ammunition storage. It appears that the septic system is still in place.

Due to the fact that this building was used for ammunition storage, the Permittee is required to investigate the site as required in Comment #14 above, with the exception that samples only need to be analyzed for explosives.

21. Buildings 1226, 1235 and 1239

The history of these buildings provided in the SAR indicates that they were historically used for munitions maintenance. It appears that the septic systems are still in place.

Due to the fact that these buildings were used for munitions maintenance, the Permittee is required to investigate the sites as required in Comment #14 above, with the addition of explosives to the list of COPCs.

22. Building 1250

This septic system serviced a former water pumping station. Therefore, no further investigation of this site is necessary.

23. Building 1251

The history of the building provided in the SAR indicates that it was historically used as a research and testing shop. The SAR did not provide a description of the current use or of any drains that discharged into the septic system. It appears that the septic system is still in place.

Due to the fact that this building was used as a research and testing shop, the Permittee is required to investigate the site as required in Comment #14 above.

24. Building 1269

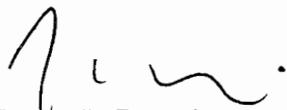
The history of the building provided in the SAR indicates that it was historically used as a medical science laboratory. The SAR did not provide a description of any drains that discharged into the septic system. It appears that the septic system is still in place.

Due to the fact that this building was used as a medical science laboratory, the Permittee is required to investigate the site as required in Comment #14 above, with the addition of tritium to the list of COPCs.

Ms. Debbie Hartell
September 13, 2007
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The Permittee must respond within ninety (90) 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

cc: J. Kieling, NMED HWB
W. Moats, NMED HWB
C. Amindyas, NMED HWB
D. Strasser, NMED HWB
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File: HAFB 2007 and Reading
HWB-HAFB-07-005