HAFB07

NEW MEXICO
ENVIRONMENT DEPARTMENT

Ground Water Quality Bureau

1190 St. Francis Drive
P.O. Box 26110, Santa Fe, NM 87502
Phone (505) 827-2918 Fax (505) 827-2965
www.nmenv.state.nm.us

BILL RICHARDSON
Governor
DIANE DENISH
Lieutenant Governor

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Secretary
CINDY PADILLA
Deputy Secretary

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

October 31, 2007

Mr. David G. Griffin
Environmental Water Resources
Holloman Air Force Base
49 CES/CEV
550 Tabosa Avenue
Holloman Air Force Base, NM 88330

RE: Holloman Air Force Base Discharge Permits: DP-499, DP-1127, DP-1446, and DP-1479

Dear Mr. Griffin,

On February 6, 2007, George Schuman and Robert George of the New Mexico Environment Department Ground Water Quality Bureau (NMED-GWQB) met with you and other representatives of Holloman Air Force Base (HAFB) to discuss the permitting status of various HAFB facilities. At that meeting, data was presented to NMED by HAFB in an effort to demonstrate that a number of the HAFB facilities that are currently permitted pursuant to the Water Quality Control Commission (WQCC) Regulations (20.6.2 NMAC) are actually discharging to ground water that has an existing concentration of 10,000 mg/L Total Dissolved Solids (TDS) or greater, and are therefore not subject to NMED's permitting authority pursuant to the New Mexico Water Quality Act (WQA), NMSA 1978 §§74-6-1 through 74-6-17, and the New Mexico Water Quality Control Commission (WQCC) Regulations, 20.6.2 NMAC. Following the meeting, NMED investigated the data that was submitted, NMED's own records, and reference data in order to determine the future permitting requirements of discharges made under Discharge Permits DP-499, DP-1127, DP-1446 and DP-1479. The following discussion

summarizes the nature of the discharges covered by these Discharge Permits and NMED's determination regarding each facility:

DP-499 National Radar Test Facility

Synopsis- This site is permitted to discharge up to 28,000 gallons per day (gpd) of domestic wastewater and oil separator water from the National Radar Test Facility (NRTF) to unlined lagoons for disposal, following treatment in an extended aeration package treatment plant. This facility's Discharge Permit expired on August 6, 2007. A Discharge Permit renewal application has not been submitted to NMED, as it is pending NMED's determination regarding the permitting status via this letter. Depth to ground water at this site is reported at 3 feet and the TDS of ground water most likely to be affected by the discharge is reported to be 60,000 mg/L.

Actions- Information submitted by HAFB establishes that the shallow ground water in the vicinity of the discharge contains in excess of 60,000 mg/L of TDS. The evidence submitted supports the argument that the discharge is made exclusively to ground water containing TDS in excess of 10,000 mg/L, and that there is no opportunity for the discharged effluent to move directly or indirectly to ground water which has a TDS concentration of 10,000 mg/L or less. NMED has therefore determined that the discharge from the NRTF is not subject to Discharge Permit requirements set forth in 20.6.2 NMAC. Based upon this determination, HAFB may request termination of DP-499.

DP-1127 HAFB Wastewater Treatment Facility

Synopsis- This facility is permitted to discharge up to 4,500,000 gpd of reclaimed wastewater to the HAFB golf course for irrigation or into a natural wetland for disposal, following treatment in an extended aeration municipal treatment facility. The discharge to the natural wetlands is also authorized under a federal National Pollutant Discharge Elimination Systems (NPDES) permit (NM0029971). DP-1127 was renewed on October 28, 2002 and will expire October 28, 2007. NMED is aware of twenty five (25) active septic tank/leach field installations within HAFB and has sought to have these included in DP-1127 through a modification upon permit renewal. Depth to ground water at the treatment plant discharge sites is reported to be 2 – 14 feet and the TDS reportedly ranges from 16,000 – 33,000 mg/L, although isolated pockets of shallow ground water having TDS values of 10,000 mg/L or less clearly exist in the vicinity.

Actions- Although the reported TDS for this discharge site ranges from 16,000 – 33,000 mg/L, HAFB has not conclusively demonstrated that the discharge of 4,500,000 gallons per day of reclaimed wastewater will not move directly or indirectly to ***any*** ground water containing 10,000 mg/L TDS or less. Furthermore, the public health protections related to the use of reclaimed wastewater at the golf course in the current and future versions of DP-1127 make permitting of the site appropriate. Therefore, NMED has determined that this discharge is subject to NMED's permitting authority pursuant to 20.6.2 NMAC. HAFB personnel has supplied information regarding TDS concentrations below the currently unpermitted septic tank/leachfield systems scattered throughout HAFB.

Nineteen (19) of these are discharging to ground water containing greater than 10,000 mg/L TDS and have very little possibility of reaching and/or affecting ground water that contains 10,000 mg/L TDS or less. However, six of the septic tank/leachfield systems are clearly discharging to ground water containing 10,000 mg/L TDS or less. The attached table (TABLE "A") identifies the septic tank/leachfield systems within HAFB that NMED asserts permitting authority over and intends to include in the renewal and modification of DP-1127. **As such, NMED requests that HAFB submit an application for the renewal and modification of DP-1127 that includes the six (6) identified septic tank/leachfield systems prior to November 30, 2007.**

DP-1446 HAFB Hydrocarbon Land Farm

Synopsis- This permit authorizes the discharge of up to 8,000 cubic yards (at any one time) of hydrocarbon contaminated soil from HAFB. This site was originally permitted on June 14, 2004 and the current permit will expire on June 14, 2009. The reported depth to ground water at the discharge site is 23 feet and a TDS concentration of 26,600 mg/L is cited. Data from monitoring wells intended to monitor ground water affected by the discharge indicates that ground water TDS in the vicinity is greater than 10,000 mg/L.
Actions- Based on the data provided by HAFB, NMED's data, and the nature of the discharge, NMED has determined that the ground water potentially affected by the discharge exceeds 10,000 mg/L TDS and the discharge is therefore not required to be regulated under a Discharge Permit. Holloman Air Force Base may request termination of DP-1446.

DP-1479 HAFB T-38 Hydrocarbon Land Farm

Synopsis- This permit authorizes the discharge of up to 155,000 cubic yards of hydrocarbon contaminated soil or up to 16,000 cubic yards at any one time. This site was originally permitted on October 5, 2005 and will expire on October 5, 2010. The reported depth to ground water at the discharge site is 15.4 feet and a TDS concentration of 24,500 mg/L is cited. Data from monitoring wells intended to monitoring ground water affected by the discharge indicates that ground water TDS in the vicinity is greater than 10,000 mg/L.
Actions- Based on the data provided by HAFB, NMED's data, and the nature of the discharge, NMED has determined that the ground water potentially affected by the discharge exceeds 10,000 mg/L TDS and the discharge is therefore not required to be regulated under a Discharge Permit. Holloman Air Force Base may request termination of DP-1479.

Please be advised that other state and/or federal regulations may be applicable to the sites evaluated herein, and this determination does not relieve HAFB of any other responsibility for meeting state and/or federal regulatory requirements at these sites. Also be aware that DP-499, DP-1446 and DP-1479 contain specific requirements for termination, including closure requirements. Because it is expected that these facilities will continue to operate following permit termination, the termination requirements will need to be altered. These changes will be discussed following HAFB's formal request to terminate these permits.

Thank you for your cooperation during the evaluation of these discharge sites. If you have any questions in this matter, please contact Pollution Prevention Section Manager George Schuman at 827-2945.

Sincerely,

George Schuman for W. Olson

William Olson, Chief
Ground Water Quality Bureau
New Mexico Environment Department

WO:JM/RJG

Enclosure: TABLE "A"; septic tank/leach field inventory

CC: James Bearzi, Chief, NMED Hazardous Waste Bureau
Ken Smith, NMED District III Manager
Jim Sizemore, New Mexico Office of the State Engineer
George Schuman, NMED-GWQB
Robert George, NMED-GWQB
Jennifer Montoya, NMED-GWQB