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NEW MEXICO
ENVIRONMENT DEPARTMENT



Hazardous Waste Bureau

BILL RICHARDSON
Governor

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.nmenv.state.nm.us

RON CURRY
Secretary

DIANE DENISH
Lieutenant Governor

JON GOLDSTEIN
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 30, 2008

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

**RE: NOTICE OF DISAPPROVAL: RCRA FACILITY INVESTIGATION (RFI)
WORK PLAN, CHEMICAL AGENT DISPOSAL SITE (DP-64), OCTOBER 2007
HOLLOMAN AIR FORCE BASE, NM6572124422
HWB-HAFB-07-010**

Dear Ms. Hartell:

The New Mexico Environment Department (NMED) has reviewed the subject Work Plan, which was submitted for the performance of site characterization activities at Site DP-64 (AOC-1) at Holloman Air Force Base (the Permittee). This site was subject to an ordnance and explosive removal action conducted under contract to the US Army Corps of Engineers in 2004. A report on this removal action, which the NMED considered a Voluntary Corrective Measure, was submitted in September 2005. Review of this report resulted in the NMED issuing a Notice of Deficiency dated April 14, 2006. The subject Work Plan was submitted in response to that Notice of Deficiency.

NMED has determined that the Work Plan cannot be approved at this time, as revisions are necessary. The following are the deficiencies the Permittee is required to address before the NMED can make a decision about approval of the Work Plan:

1. The RFI Work Plan, as submitted, does not provide an adequate response to the aforementioned Notice of Deficiency for the ordnance removal action, dated April 14, 2006. In particular, the Permittee did not provide responses to comment numbers 1, 2, 4, or 5. Comment number 3, which required that the Permittee submit a work plan to conduct sampling activities at the burn pit sites, was the only comment responded to. NMED can not finalize review the subject Work Plan until the remaining comments are responded to. The Permittee must revise the subject Work Plan to respond to all of the Notice of Deficiency comments.

2. **Page 3-1, Section 3, 3rd Paragraph, 3rd Sentence**

This sentence states that "...if results from the soil samples do not indicate concentrations above the reporting limit, additional sampling will not be conducted and the RFI Report will be prepared." This appears to exclude any groundwater sampling. The Permittee is required to install a minimum of three groundwater monitoring wells (of the proposed six) and sample the groundwater for VOCs, SVOCs, RCRA Metals, explosives and TDS. This activity must occur regardless of the soil sampling results. The three remaining monitoring wells, including the deep well, will also be installed and sampled as proposed in the Work Plan if conditions warrant. The Permittee must revise the subject Work Plan to reflect this requirement.

3. **Page 3-4, Section 3.3.2, 2nd Paragraph**

This paragraph provides a list of proposed groundwater analytes. In addition to the proposed analytes, the Permittee is required to revise the subject Work Plan to include nitrate/nitrite in the list of analytes.

4. **Page 4-1, Section 4.2**

This section indicates that "Metals detected in soil will be evaluated against the current NMED residential risk-based soil screening levels (SSLs)". The Permittee is required to revise the subject Work Plan to include evaluating metals detected in soils above the reporting limit against the soon-to-be established base-wide background concentrations, as well as the SSLs. The maximum detected concentration for each contaminant that is detected above the reporting limit must be used. These comparisons will then be used to determine the site hazard index, which must be less than 1.0. Any contaminant concentrations above the SSLs can not be screened out.

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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
L. King, EPA, Region 6 (6PD-F)
File: HAFB 2008 and Reading
HWB-HAFB-07-010