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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

May 8, 2008

Mr. David Scruggs, Chief  
Environmental Restoration Program  
49 CES/CEVR  
550 Tabosa Ave.  
Holloman AFB, NM 88330-8458

**SUBJECT: NOTICE OF DISAPPROVAL: VOLUNTARY CORRECTIVE MEASURES  
WORK PLAN, SITE OT-14 SOIL REMEDIATION, NOVEMBER 2007  
HOLLOMAN AIR FORCE BASE, NEW MEXICO  
EPA ID#: NM6572124422  
HWB-HAFB-07-012**

Dear Mr. Scruggs:

The New Mexico Environment Department (NMED) has reviewed the subject Work Plan, which was submitted for the performance of additional site characterization activities and voluntary corrective measures at Site OT-14 (SWMU 197), Holloman Air Force Base (the Permittee). Upon completion of the Work Plan review, the NMED has determined that the Work Plan cannot be approved at this time, as revisions are necessary. The Permittee is required to address the following deficiencies before the NMED can make a final determination regarding approval.

**GENERAL COMMENTS**

1. Figures/maps provided in work plans and reports must be shown to scale, depict the boundaries of the site, include a north arrow, and show a coordinate system (e.g., UTM, latitude/longitude). Further, the figures/maps must also list the coordinate system, projection, and each datum (e.g., Transverse Mercator Projection, New Mexico State Plane Coordinate System, Central Zone, 1983 North American Horizontal Datum, 1983 North American

Vertical Datum). The Permittee must revise all figures to satisfy these requirements.

2. Sample result tables provided in work plans and reports must explain all abbreviations, quality flags, and special formatting (e.g., **bold** type used to communicate specific information, J = ?, B = ?) in the footnotes. The test methods must be listed and legible, spelling errors must be corrected, and sample dates provided on the tables. The Permittee must revise all tables to satisfy these requirements.

### **SPECIFIC COMMENTS**

3. **Section 1, page 1-1, 2<sup>nd</sup> paragraph, last sentence**

The sentence states the area is “covered with a non-engineered asphalt cap.” This sentence contradicts the description in Section 2 (page 2-1, 3<sup>rd</sup> paragraph, 7<sup>th</sup> sentence), which states that the area is “covered with an engineered asphalt cap.” The Permittee must resolve this discrepancy.

4. **Section 1, page 1-1, 3<sup>rd</sup> paragraph, 5<sup>th</sup> sentence**

The sentence excludes methylene chloride (maximum concentration 32 micrograms per liter (µg/L), which is one of the detected volatile organic compounds (VOCs) in groundwater, according to Table 2-2 and the first paragraph of Section 2.1.1. The Permittee shall revise the sentence to include methylene chloride and its maximum detected concentration.

5. **Section 2, page 2-1, 3<sup>rd</sup> paragraph, last sentence**

The sentence states that a telephone pole is “installed through the center of the asphalt cap.” No figure depicts this telephone pole. The Permittee must revise Figures 3-1 and 4-1 to show the telephone pole to clarify its relationship with the proposed temporary monitoring well and position within the proposed excavation.

6. **Section 2.1.1, page 2-2, 1<sup>st</sup> paragraph, 2<sup>nd</sup> to last sentence**

The sentence states “[m]ajor dissolved anions (chloride, sulfate, fluoride, and nitrate) exceeded the New Mexico Water Quality Control Commission (NMWQCC) standards but were comparable to background levels.” The Permittee must confirm that the background levels used for comparison will be the soon-to-be established background levels and not a prior form of background levels.

7. **Section 2.1.2, page 2-2, 2<sup>nd</sup> paragraph**

According to the heading, Section 2.1.2 discusses the Phase II Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) conducted in 1994. However, the second paragraph primarily details the results of the 1991 Phase I RFI soil sampling, especially concentrations that exceeded NMED Residential Soil Screening Levels (SSLs). The second paragraph merely alludes to the 1994 results, with no detailed discussion. Section 2.1.1 is the

proper place for the detailed discussion of 1991 Phase I RFI soil sample results. In fact, the discussion of 1991 soil sample concentrations that exceed NMED SSLs is notably absent from Section 2.1.1. Finally, the second paragraph's summary does not correspond to the data as presented in Table 2-1. The Permittee must:

- a) Discuss the Phase I samples and their results in Section 2.1.1. The Phase I samples have sample numbers beginning SB-14-##.
- b) Discuss the Phase II samples and their results in Section 2.1.2. The Phase II samples have sample numbers beginning DP-14-##.
- c) Update Section 2, page 2-1, fourth paragraph, second sentence to reflect the corrections discussed in Sections 2.1.1 and 2.1.2. The sentence currently states, "Analytical results from only three samples and two analytes exceeded NMED Residential SSLs for pesticides." This sentence (Section 2, 4<sup>th</sup> paragraph, 2<sup>nd</sup> sentence) and any other occurrence of this sentence in the document must be corrected to read "five samples" and "three analytes."

8. **Section 3.2, page 3-2, 4<sup>th</sup> sentence**

The sentence states "[s]ample nomenclature will follow the Environmental Restoration Program Information Management System (ERPIMS) format," but provides no reference; the Permittee shall provide a reference.

9. **Section 3.2, page 3-2**

The Work Plan references Holloman Air Force Base (HAFB) Standard Operating Procedures (e.g., HAFB SOP-3) that provide guidance on sampling activities, decontamination, documentation, etc. The NMED has neither recently reviewed nor approved the guidance documents; the Permittee shall therefore submit the following documents for NMED review and approval: HAFB SOP-1, -2, -3, -4, -5, -6, -7, -8, -9, and -10.

10. **Section 3.2.1, page 3-3**

The Work Plan states that soil and groundwater samples will be submitted for analysis of total petroleum hydrocarbons (TPH)-gasoline range organics (GRO), TPH-diesel range organics (DRO), and TPH-oil range organics (ORO) by modified U.S. Environmental Protection Agency (USEPA) Method 8015M to Accutest Laboratories in Orlando, Florida. According to information posted on the Accutest Laboratories website ([www.accutest.com](http://www.accutest.com)), Accutest Laboratories performs analysis of TPH-GRO and TPH-DRO using USEPA Method 8015B; however, it mentions neither TPH-ORO nor Method 8015M. According to the USEPA, the current revision of SW-846 is Revision 6, Final Update IV, dated February 2007, and the most recent method for TPH-GRO and TPH-DRO is 8015C. Furthermore, USEPA Method 8015C only specifies analysis of TPH-GRO and TPH-DRO and not TPH-ORO. The Permittee must clarify the meaning of "modified USEPA Method 8015M" and specify whether this modified method is based upon USEPA Method 8015B or 8015C.

11. **Section 3.2.1, page 3-3, last paragraph; Section 3.2.2, page 3-4, last paragraph; Table 3-1; and Table 4-1 of Appendix B**

Both paragraphs state that collected samples will consist of 14 soil samples (based on six direct push technology [DPT] boreholes with two samples per borehole, including two field duplicate samples); Section 3.2.1 (page 3-3, last paragraph) further declares that all samples for VOC analysis will require a trip blank. The numbers and types of samples do not match those provided in either Table 3-1 or Table 4-1 of the Quality Assurance Project Plan Addendum (Appendix B). Table 3-1 lists two trip blanks, two field duplicates, and one matrix spike/matrix spike duplicate sample, in addition to 12 borehole samples (based on six DPT boreholes with two samples per borehole). Table 4-1 of Appendix B indicates four trip blanks, one field duplicate, and one matrix spike/matrix spike duplicate sample, in addition to 12 borehole samples (based on six DPT boreholes with two samples per borehole). The Permittee must perform the following:

- a) Update both paragraphs to include two trip blank samples, one matrix spike/matrix spike duplicate sample, and the total number of samples.
- b) Update Table 4-1 (Appendix B) to include two trip blank samples, two field duplicate samples, and update the total number of samples.
- c) Include equipment blanks as described in Comment 52.

12. **Section 3.2.2, pages 3-3 and 3-4: 1<sup>st</sup>, 2<sup>nd</sup>, and 4<sup>th</sup> paragraphs**

These paragraphs inconsistently and contradictorily describe the DPT borehole soil sampling. The first paragraph states “[b]ased upon the depth to groundwater at the site, the estimated depth of each boring will be 5 feet.” The second paragraph adds, “Samples will be collected continuously at four foot intervals” with field-screening by Organic Vapor Analyzer (OVA) conducted “at two foot intervals.” The fourth paragraph declares, “Each boring will be drilled to “12 ft bgs” with continuous collection of OVA readings. Moreover, the fourth paragraph indicates that soil sample collection will occur at the “0 to 2 foot interval” and “from across the water table (anticipated to be between 4 to 6 feet bgs).” The Permittee must rectify these inconsistencies and contradictions in all paragraphs to describe accurately the proposed sampling event.

13. **Section 3.2.2, page 3-4, 2<sup>nd</sup> paragraph**

The second sentence specifies, “All horizontal coordinates will be referenced to the State Plane Coordinate System, New Mexico Central...,” but does not indicate which datum or whether vertical coordinates will be established. The Permittee will declare a datum and specify whether vertical coordinates are included or excluded. If vertical coordinates are included, the Permittee must specify the coordinate system, datum, and measurement accuracy.

14. **Section 3.2.2.1, page 3-5; Table 3-1; and Table 4-1 of Appendix B**

Section 3.2.2.1, Table 3-1, and Table 4-1 of Appendix B states that American Society for Testing and Materials (ASTM) Method D1429 will determine soil sample specific gravity. According to a review of the ASTM methods at [www.astm.org](http://www.astm.org), the chosen method appears inconsistent with its intent at OT-14. ASTM D1429 is entitled “Standard Test Method for Specific Gravity of Water and Brine,” and its purpose is to “cover the determination of the specific gravity of water and brine free of separable oil.” Additionally, ASTM D1429, which contains several methods, applies to “clear waters or those containing only a moderate amount of particulate matter, sea water or brines,” and “samples of water containing water or sludge.” The Permittee must:

- a) Discuss selection of the method, particularly whether it is appropriate for soil samples. If the Permittee determines ASTM D1429 to be inappropriate, the Permittee must propose another method.
- b) If ASTM D1429 remains the chosen method, explain which revision of the method will be used, whether ASTM D1429-86 (listed on the Accutest website, dated 1986) or the most recent version (ASTM D1429-03, dated 2003).

15. **Section 3.2.3, page 3-5, 2<sup>nd</sup> paragraph**

The last sentence states, “Following sampling, the temporary monitoring well will be completely removed from the ground and the borehole will be sealed in accordance with HAFB SOP-10.” The newly constructed well must remain in-place until after receipt and review of all analytical results related to the well; and after the Permittee obtains permission for removal from the NMED. Furthermore, the Permittee shall protect the temporary well from surface water infiltration (runon/runoff) and install devices to protect from vehicles (e.g., bollards). The Permittee will alter the sentence or add sentences to include this information.

16. **Section 3.2.3, page 3-5, 3<sup>rd</sup> paragraph**

The paragraph incompletely describes the sampling of the groundwater monitoring wells. The paragraph describes laboratory analyses and the number of samples; however, the discussion excludes field parameters (e.g., pH, temperature, electrical conductivity, etc.). The Permittee will:

- a) Revise the paragraph to include field parameters.
- b) Add a table to include the field parameters and use information consistent with Table 3-1 of Appendix B.
- c) Include the revisions of Comment 17.

17. **Section 3.2.3, page 3-5, 3<sup>rd</sup> paragraph; Table 3-2; and Table 4-1 of Appendix B**

This paragraph and both tables inconsistently list and describe the number of proposed groundwater samples (Comment 11). Moreover, this paragraph and tables failed to address equipment blanks (Comment 52). The Permittee will alter each table and the paragraph, making each element mutually consistent and ensuring the paragraph describes all sample types (e.g., matrix spike/matrix spike duplicate and equipment blanks).

18. **Section 3.2.3.1, page 3-5, 3<sup>rd</sup> sentence**

The sentence states, "Vertical elevations will be referenced to the North American Datum (NAD) [of] 1983." The Permittee will provide a reference datum for the horizontal locations.

19. **Section 3.2.3.1, page 3-6, last sentence**

The sentence states, "... all maps will include a coordinate system (e.g., latitude/longitude) and the site boundaries." All maps must also include a north arrow and scale and list the coordinate system, projection, and each datum (e.g., Transverse Mercator Projection, New Mexico State Plane Coordinate System, Central Zone, 1983 North American Horizontal Datum, 1983 North American Vertical Datum). The Permittee must revise the sentence to include these requirements.

20. **Section 3.3, page 3-6, 2<sup>nd</sup> paragraph**

The paragraph describes nomenclature "for groundwater samples collected from direct push boreholes." The Work Plan describes soil sample collection from direct push boreholes in Sections 3.2.2 and 3.2.2.1 and groundwater samples from the temporary and existing monitoring wells in Section 3.2.3. However, the Work Plan does not describe collection of groundwater samples from direct push boreholes. The Permittee shall correct this discrepancy.

21. **Section 3.4, page 3-7**

The section does not provide the laboratory analytical methods for characterizing investigation-derived waste water. The Permittee shall describe the laboratory analytical methods and procedures for characterization of investigation-derived waste water.

22. **Section 3.4, page 3-7, 2<sup>nd</sup> to last sentence**

The sentence states, "Other liquid wastes, such as decontamination rinses, are anticipated to be non-hazardous and as such, can be disposed of through the HAFB Wastewater Treatment Plant or (WWTP)." The Permittee shall treat all liquid wastes, particularly decontamination rinses, in the same manner as purged groundwater from development and sampling activities. They shall "be containerized and maintained by Bhate until disposal through the HAFB Wastewater Treatment Plant (WWTP), pending laboratory analysis," as required above. If

the laboratory results indicate analyte concentrations exist below target concentrations, the Permittee may dispose of liquid wastes via the HAFB WWTP. The Permittee shall alter the sentence to comply with these conditions.

23. **Section 3.4.1, page 3-7, 3<sup>rd</sup> sentence**

The sentence states, "The containers and decontamination pad will be managed in a secure area and the decontamination water will either be allowed to evaporate or combined with the purged groundwater and discharged to the HAFB WWTP." The Permittee will:

- a) Clarify to which containers the sentence refers because no discussion of containers appears in the paragraph.
- b) Alter the sentence and/or paragraph to include a description of the containers.
- c) Remove the phrase, "either allowed to evaporate or," from this sentence.
- d) Add the phrase, "pending laboratory analysis" to the end of the sentence.

24. **Section 3.4.1, page 3-7, last sentence**

The sentence states, "Sediment remaining in the decontamination pad area after the water has either evaporated or been discharged to the WWTP, will be combined with the soil to be remediated in the onsite landfarm or spread on the ground." The Permittee will modify the sentence or paragraph to incorporate the following:

- a) Evaporation of any liquid waste (i.e., purge groundwater, decontamination water, etc.) is not an approved method of disposition or treatment; therefore, the Permittee shall remove references to evaporation.
- b) Liquid waste collection, maintenance, and characterization by laboratory analysis prior to disposition will occur.
- c) Prior to disposition, the sediment from the decontamination pad requires characterization and data evaluation. To spread the sediment on the ground, the analytical results must indicate the sediment is suitable for use as clean backfill; otherwise, disposal in an appropriate facility or combination of the sediment with the soil to be remediated must occur. The Permittee shall revise the section to include these statements.

25. **Section 3.4.2, page 3-7, 1<sup>st</sup> sentence**

The sentence states, "Prior to disposal, used personal protective equipment (PPE), disposable items, and the decontamination pad liner will be rinsed clean with tap water and diluted detergent solution." The Permittee must describe collection, management, and characterization of the water and detergent solution.

26. **Section 4**

Section 4 discusses the mechanics of the excavation, including equipment, required forms and approvals, site safety, decontamination, shoring, and backfilling; however, no mention of

dust suppression appears. The first mention of dust suppression occurs in Table 5-1 of Appendix A. The Permittee must revise the section to include dust suppression activities.

27. **Section 4, page 4-1, 1<sup>st</sup> paragraph, 2<sup>nd</sup> to last sentence; Section 4.1.3, page 4-2, 2<sup>nd</sup> paragraph, 4<sup>th</sup> sentence; and Section 9, last paragraph**

Section 4 (first paragraph, second to last sentence) states, "Based upon the historical analytical results, it is anticipated that the top 2 feet of soil beneath the cap may be excavated..." Likewise, the second paragraph of Section 4.1.3 states "the depth to the bottom of the excavation, if necessary, is expected to reach 2 feet bgs." According to Section 9, last paragraph, "excavation depths are expected to exceed 4 ft, and be less than 9 ft..." The Permittee must revise each sentence to state clearly and consistently the expected depth of excavation.

28. **Section 4.2, page 4-2, last sentence**

The sentence states, "Heavy equipment, such as the backhoe, trackhoe, etc. will be decontaminated at a temporary decontamination pad set up at the site." The Permittee shall provide specifics on the decontamination process and describe collection, management, and characterization of decontamination solutions.

29. **Section 4.3.1, page 4-3, last sentence**

According to the sentence, Figure 4-1 shows the proposed excavation area. However, the proposed excavation area does not include previous DPT soil boring locations 14-DP-10 and 14-DP-12. According to Table 2-1, 14-DP-10 (2,200 micrograms per kilogram ( $\mu\text{g}/\text{kg}$ )) exceeded the NMED SSL for heptachlor (1,080  $\mu\text{g}/\text{kg}$ ) and 14-DP-12 (26,000  $\mu\text{g}/\text{kg}$ ) exceeded the NMED SSL for chlordane (16,200  $\mu\text{g}/\text{kg}$ ). The Permittee must:

- a) Explain the exclusion of the two sample locations from the excavation plan.
- b) Alter the excavation description to include both sampling locations.
- c) Modify Figure 4-1 to include both sampling locations and the changes listed in Comment 5 and the General Comment 1.
- d) Sample nomenclature for the DPT soil borings is inconsistent between the figures and Table 2-1. Using the two DPT soil borings missing from Figure 4-1, Table 2-1 lists them as DP-14-10 and DP-14-12 while the figures list them as 14-DP-10 and 14-DP-12. The Permittee must establish consistent sample nomenclature among all figures, tables, and within the text of the Work Plan.
- e) Update the calculation of the proposed excavated soil listed in Section 2.2, 2<sup>nd</sup> paragraph, 1<sup>st</sup> sentence, which states, "... it appears that approximately 360 cubic yards of soil may have exceeded the NMED SSLs (Figure 2-1)." The updated calculation will include area surrounding the two soil boring locations and the proposed excavation depth in Comment 27.

30. **Section 4.3.3, page 4-3, 3<sup>rd</sup> sentence**

The sentence states, "All overburden soils determined to be clean will be removed prior to the removal of contaminated soils." At the end of the sentence, the Permittee must insert references to Sections 5.1.1 and 5.1.2, which describe field screening and characterization of the overburden soils. Without the reference, the information in the section appears incomplete.

31. **Section 4.3.3.1, page 4-3, 4th sentence**

The sentence states "Samples will be collected at a minimum frequency of 2 per 18 linear feet (ln ft) per side wall at mid-depth of the contamination zone." The Permittee must revise the sentence to state that confirmatory sample collection shall be biased to areas with the greatest potential for contamination.

32. **Section 4.3.4, page 4-4**

The first sentence of the section states, "Clean soils will be obtained for backfill as needed from the HAFB borrow area or FT-31 Landfarm." Subsequent sentences describe the particulars of the backfill and pertinent methods. The Permittee must revise the section to include the statement that the excavation will not be backfilled until confirmation sampling confirms the absence of contaminated soil. This may require additional excavation and confirmation sampling based upon the results of the first round and subsequent rounds of confirmatory sampling.

33. **Section 4.3.5, page 4-4, 1<sup>st</sup> sentence**

The sentence states, "Contaminated soil will be transported to the appropriate offsite facility based upon the soil sample analytical results and (toxicity characteristic leaching procedure) (TCLP) analysis." The Permittee must include a reference to Section 5.1, which describes the waste characterization analysis using the toxicity characteristic leaching procedure, and Section 5.1.3 Excavation Confirmation Sampling. The Permittee must also define TCLP in this section, as this appears to be the first time the acronym is used in the document; the occurrence in Section 5.1 is not the first call-out of TCLP.

34. **Section 5.1.1, page 5-1**

The Permittee must include reference to Table 4-1 in this section.

35. **Sections 5.1.2 and 5.1.3, page 5-1**

The Permittee must include reference to Table 5-1 in these sections.

36. **Table 5-1**

The table does not specify the holding times for mercury, which is included in the analyses of

the RCRA metals and the TCLP metals. The Permittee must add holding times for mercury analyses to the table.

37. **Section 6.1, page 6-1 and Section 6.2.4, page 6-2**

Both sections state that the Permittee will compare analyte concentrations against the NMED Residential SSLs. The Permittee must revise these sections to include comparison with the soon-to-be established background levels, in addition to the NMED Residential SSLs.

38. **Section 6.1, page 6-1**

The last sentence states, "Although the presence of TPH is not anticipated at this site, the analytical results will be compared to NMED SSLs for petroleum hydrocarbons." The Permittee will:

- a) At the end of this sentence, the Permittee will insert reference to the *New Mexico Environment Department TPH Screening Guidelines*, October 2006 (NMED, 2006b), to differentiate TPH screening levels from soil screening levels in the *Technical Background Document for Development of Soil Screening Levels, Revision 4.0*, June 2006 (NMED, 2006a).
- b) Update the References section to include the most current version of the *TPH Screening Guidelines*. Update all call-outs of "(NMED, 2006)."
- c) Include statements that describe the use of the groundwater data and specify the standards that will be used for comparison (e.g., New Mexico NMWQCC standards and soon-to-be established background concentrations).

39. **Section 6.2, page 6-1, 2<sup>nd</sup> sentence**

The sentence states that the Permittee will submit a "Closeout Report." The Permittee must modify the sentence, declaring submission of an Accelerated Corrective Measures Completion Report.

40. **Section 6.2.4, page 6-2, 2<sup>nd</sup> sentence**

The sentence states, "If the maximum concentration of each chemical of potential concern (COPC) in soil and groundwater is below its respective SSL, no additional analysis will be performed, and the findings will be reported to NMED." The first sentence in the paragraph refers to the *Technical Background Document for Development of Soil Screening Levels, Revision 4.0*, June 2006. The Permittee will:

- a) Describe the comparison of all data, both soil and groundwater, to soon-to-be established background concentrations.
- b) Groundwater data are not evaluated using soil screening levels. Revise the section to detail the evaluation of groundwater data, including comparison to soon-to-be established background concentrations and the NMWQCC standards.

41. **Section 7.1.1, page 7-1, last sentence**

The sentence states, "If laboratory analysis indicates concentrations are below the SSL for TPH of 940 milligrams per kilogram (mg/kg), and the SSL for each individual VOC, semi-volatile organic compound (SVOC), and pesticide constituent, the stockpiled soil will be used as backfill once the excavation activities are complete." The Permittee will include metals in the list of constituents to maintain consistency with the proposed sampling program.

42. **Section 7.2, page 7-1**

The Permittee will refer to Comments 23 and 24, regarding decontamination water, and modify this section in accordingly.

43. **Section 7.3, page 7-1; Section 3.4, page 3-7, last sentence; and Section 3.4.2, page 3-7, 1<sup>st</sup> sentence**

Section 7.3 and Section 3.4 (last sentence) indicate that PPE will be placed directly into standard trash receptacles. In contrast, Section 3.4.2, page 3-7, 1<sup>st</sup> sentence states, "Prior to disposal, used PPE...will be rinsed clean with tap water and diluted detergent solution." Comment 25 addresses the sentence in Section 3.4.2. The Permittee shall revise Sections 7.3 and 3.4 to establish consistency with Section 3.4.2 (including all revisions required by comments) regarding handling of PPE.

44. **Section 8.3.4, page 8-2, 2<sup>nd</sup> sentence**

The sentence states, "In accordance with U.S. Army Corps of Engineers (USACE) EM200-1-6, the investigative data is classified as definitive data." The Permittee must provide a title for USACE EM200-1-6 in the sentence and include the document in the list of References.

45. **Section 8.3.4, page 8-3, 2<sup>nd</sup> to last sentence**

The sentence states, "Risk evaluation and sampling results will be tabulated and summarized in the Voluntary Corrective Measures (VCM) report for the site." The Permittee must change "VCM report" to "Accelerated Corrective Measures Completion Report."

46. **All tables**

No table describes the proposed field screening of the soil borings or the collected sample headspace (headspace analysis); consequently, the tables present an incomplete summary of sampling activities, as described in the Work Plan text. The Permittee must either generate a new table to capture the field screening of soil boring and sample headspace or add this element to an existing table.

47. **Appendix A. HASP Addendum: Section 2, page 2-1, 3<sup>rd</sup> paragraph, 2<sup>nd</sup> sentence**

The sentence states, “Analytical results from only three samples and two analytes exceeded the New Mexico Environment Department (NMED) Residential Soil Screening Levels (SSLs) for pesticides.” This summary is inconsistent with the data results, as detailed in Comment 7. The Permittee shall refer to Comment 7 for guidance on correcting and revising the sentence.

48. **Appendix A HASP Addendum: Section 3.1, page 3-1, Table 3-1 and Attachment B**

The tables list the chemicals expected at OT-14. Both tables list only four VOCs (benzene, toluene, ethylbenzene, and xylenes). Table 3-1 lists “pesticides” and Attachment B lists four pesticides (chlordane, heptachlor, aldrin, and DDT). The Permittee must explain the absence of the following chemicals, which previous sampling and analysis detected, revealed elevated concentrations, or indicated the exceedence of NMED SSLs:

- Methylene chloride
- 2-4-D
- 4,4-DDD
- 4,4-DDE

49. **Appendix A HASP Addendum: Section 6.2, page 6-1, Table 6.3**

According to the 1<sup>st</sup> sentence in Section 6.2, Table 6-3 describes required decontamination procedures. However, the table lacks all procedures described in the Work Plan Sections 3.4 and 4.2 (refer to Comments 21, 22, 23, 24, 25, 28, and 42). The Permittee must revise Table 6.2 of Appendix A to contain all decontamination procedures described in the Work Plan.

50. **Appendix A HASP Addendum: Section 7, page 7-1**

The second sentence states, “Site communication amongst works shall be a combination of verbal and line of sight hand communications.” The last sentence states, “Cellular telephone use is not permitted while operating equipment.” The section does not indicate how the support zone will communicate with heavy equipment operators or communication between heavy equipment operators, should either be necessary. The Permittee shall revise the section to include communications with and among heavy equipment operators.

51. **Appendix B Quality Assurance Project Plan Addendum: Section 3, Table 3-2**

Table 3-2 of Appendix B summarizes the definitive data for soil and groundwater samples. The table does not list any data related to investigation derived waste characterization; TCLP is not included among the parameters. The Permittee will revise the table to include all definitive data described in the Work Plan.

**52. Appendix B Quality Assurance Project Plan Addendum: Section 4, Tables 4-1 and 4-2**

Neither Table 4-1 nor Table 4-2 of Appendix B list any equipment blanks. The equipment blank helps to assess contamination introduced by the sampling equipment either directly or through improper cleaning. The Permittee will revise Section 4, Tables 4-1 and 4-2 of Appendix B, and Work Plan Sections 3.2.1, 3.2.2, 3.2.3, 4.3.3.1, and Table 3-1 of the Work Plan to include the equipment blank. Comments 11 and 17 also address some of these sections and tables.

**53. Appendix B Quality Assurance Project Plan Addendum: Section 4, Table 4-3**

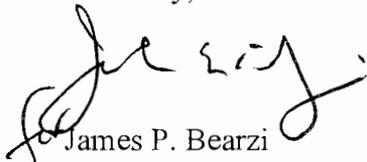
Table 4-3 of Appendix B provides the laboratory (Accutest) quality control limits for each analyte. A comparison of these quality control limits with the evaluation criteria (e.g., NMED Residential SSLs and NMWQCC standards) reveal that some laboratory reporting limits for soil samples exceed NMED Residential SSLs. If the TDS of the groundwater are less than 10,000 milligrams per liter (mg/L), some water reporting limits will exceed the NMWQCC standards. The Permittee must:

- a) Obtain new, lower reporting limits from Accutest or contract with a laboratory that can provide lower reporting limits.
- b) Revise Table 4-3 of Appendix B, listing the new reporting limits, including comparison to evaluation criteria, chemical abstracts services (CAS) numbers for all analytes, and properly spelled, legible words (e.g., truncated words appear in the table).

Please submit the required information in the form of a revised Corrective Measures Work Plan that incorporates all the responses to the above NOD in two hard copies indicating added information in highlights, and deleted information in strikeouts, and on two CDs compatible with Microsoft Word. Further, in order to expedite review of the responses, provide a matrix of the comments and HAFB responses.

If you have any questions on the NOD or if you would like to discuss the comments prior to your response, please contact Dezbah Tso of my staff at (505) 222-9528, or at the above letterhead address.

Sincerely,



James P. Bearzi  
Chief  
Hazardous Waste Bureau

JPB:dat

Mr. David Scruggs  
May 8, 2008  
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cc: J. Kieling, NMED HWB  
W. Moats, NMED HWB  
C. Amindyas, NMED HWB  
D. Tso, NMED HWB  
L. King, EPA, Region 6 (6PD-F)  
File: HAFB 2008 and Reading  
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