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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 19, 2008

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

**SUBJECT: NOTICE OF DISAPPROVAL: PARTIAL RESPONSE TO NOTICE OF DEFICIENCY ON SWMU ASSESSMENT REPORT, SEPTIC TANKS, MARCH 13, 2008
HOLLOMAN AIR FORCE BASE, NM, EPA ID# NM6572124422
HWB-HAFB-07-005**

Dear Mr. Scruggs:

The New Mexico Environment Department (NMED) has reviewed Holloman Air Force Base's (the Permittee's) March 13, 2008 partial response to NMED's September 13, 2007 Notice of Deficiency (NOD) for the SWMU Assessment Report (SAR) for the Permittee's septic tanks dated April 2007. NMED has determined that the partial response is inadequate. The Permittee is required to address the following comments before the NMED can make a decision about approval of the SAR and the future investigation requirements for the septic systems. The comment numbers addressed herein are the comment numbers from the NMED NOD.

1. General Comment

The NMED acknowledges the Permittee's assertion that many of the NOD comments will be fully addressed by the submittal of a future work plan, pending receipt of funds. These comment numbers are 3, 4, 5, 6, 7, 8, 9, 11, 14, 15, 16, 17, 18, 20 and 23. The

Permittee shall provide a date, subject to NMED's review and approval, for the submission of this work plan.

2. **Comment #2**

The response to this comment states that Buildings 1219, 1226, 1235 and 1239 still have active septic systems that were erroneously reported as being inactive. Therefore, no investigation of these systems is required at this time. However, the Permittee is reminded that the NMED must be notified within 90 days before any of these septic systems are deactivated or removed. The Permittee must also revise the "*Septic Tank Map Location and Status*" table that was submitted with the map volume of the SAR to indicate the changed status of these systems.

3. **Comment #2**

The response to this comment states that Building 702 has been newly added to the list of inactive septic systems. The Permittee is required to provide the location of this building and a description of the historical activities associated with this building to allow the NMED to determine if this system will require further investigation. The Permittee must also revise the "*Septic Tank Map Location and Status*" table that was submitted with the map volume of the SAR to add this building to the list of inactive septic systems.

4. **Comment #2**

The response to this comment states that Buildings 638, 642, 1142, 1168, 1155 and 1269 have been newly added to the list of removed septic systems. The Permittee is required to provide the locations of these buildings and a description of the historical activities associated with each building to allow the NMED to determine if these systems will require further investigation. The Permittee must also revise the "*Septic Tank Map Location and Status*" table that was submitted with the map volume of the SAR to add these buildings to the list of removed septic systems.

5. **Comments #3 and #8**

Attachment #23 was submitted as part of the response to these two comments. This Attachment is unreadable as submitted. The Permittee is required to resubmit this Attachment so that all notations can be read and, preferably, in color. It also must be no larger than 11" X 17" (folded, multiple sheets).

6. **Comment #4**

The response to this comment only addressed those buildings at the south end of the test track, which the NMED was already aware of. It did not identify any other buildings that

are on or in the vicinity of the entire length of the track, nor did it address the buildings at the Early Missile Test site (OT-37). The Permittee is again required to identify any buildings along the entire length of the test track and at OT-37 that historically used or are presently using septic systems. The Permittee is required to provide the locations of these systems and a description of the historical activities associated with each building and current status to allow the NMED to determine if these systems will require further investigation. The Permittee must also revise the "*Septic Tank Map Location and Status*" table that was submitted with the map volume of the SAR to add these buildings to the list of septic systems.

7. **Comment #5**

This comment required that the Permittee locate and map all leachfields and distribution lines at septic system sites for which the NMED is requiring further investigation. The Permittee is advised that the sites for which the NMED has determined that further investigation is required, to date, are at the following buildings: 308, 1190, 1194, 1199, 1200, 1201, 1221 and 1251. The sites that may require further investigation, to date, pending proposed further preliminary research, are at the following buildings: 639, 640, 700, 702, 920, 921, 922, 924, 1142, 1158, 1174, 1178, 1179, 1180, 1183 and 1196.

The response to this comment included the submission, as attachments, of large blueprints showing locations of systems for some of the sites requiring further investigation. The Permittee is advised that these blueprints do not satisfy the requirements of this comment. Individual drawings must be prepared for each system requiring further investigation that show the locations and depths of all leachfield components and distribution lines. This information may be obtained from some of the blueprints while other locations may require excavation. These drawings must meet the requirements of Comment #8 of the NOD. In addition, no drawings shall be larger than 11" X 17", folded. NMED acknowledges that sampling requirements will be addressed in a future work plan. This work plan shall include the preparation of the drawings required by this comment.

8. **Comment #5**

The response to this comment references the following buildings with septic systems that were not addressed in the initial SAR: 639, 640, 700, 1142, 1158, 1174, 1178, 1179, 1180 and 1183. The Permittee is required to provide the locations of these systems and a description of the historical activities associated with each building and current status to allow the NMED to determine if these systems will require further investigation. The Permittee must also revise the "*Septic Tank Map Location and Status*" table that was submitted with the map volume of the SAR to add these buildings to the list of septic systems.

9. **Comment #6**

As indicated in item #7 above, the Permittee is advised that the blueprints submitted in response to this comment as attachments are not acceptable. The requirement of this comment to locate all floor drains and sumps that could drain into the septic systems requiring further investigation shall be met by showing the drains and sumps on the drawings required by item #7 above. NMED acknowledges that this comment will be addressed in the future work plan.

10. **Comment #7**

The response to this comment provides information about materials previously stored in Buildings 1091 and 1097. The Permittee is reminded that NMED previously determined that no further investigation is required at these sites based on preliminary information already provided. The Permittee must clarify why these buildings were included in the response to this comment.

11. **Comment #8**

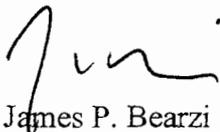
As indicated in item #7 above, the Permittee is advised that the blueprints submitted in response to this comment as attachments are not acceptable. All drawings submitted with the future work plan must meet the requirements of Comment #8 of the NOD and as specified in the above comments.

12. **Comment #10**

The response to this comment provides a description of the types of hazardous materials/waste used in Building 308. Given this information, the NMED has determined that this septic system must be investigated as specified in Comment #14 of the NOD. See item #7 above for a current listing of systems that the NMED has determined must be investigated and those that may need to be investigated.

Please respond to this Notice of Disapproval within ninety (90) calendar days of receipt of this notice. 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

Mr. David Scruggs
June 19, 2008
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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-07-005