



DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS 49TH FIGHTER WING (ACC)  
HOLLOMAN AIR FORCE BASE, NEW MEXICO

ENTERED

JUN 23 2008



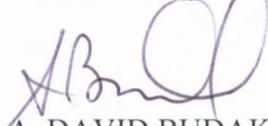
MEMORANDUM FOR NEW MEXICO ENVIRONMENT DEPARTMENT

Attn: Mr. James Bearzi  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East  
Santa Fe NM 87105-6303

FROM: 49 CES/CD  
550 Tabosa Ave  
Holloman AFB NM 88330-8458

Subject: Response to 8 May 2008 Notice of Disapproval: Voluntary Corrective Measures  
Work Plan, Site OT-14 Soil Remediation, November 2007 Holloman AFB,  
NM6572124422 HWB-HAFB-07-012

1. Our response to comments table for subject Work Plan is hereby submitted to NMED for review and approval. The updated Work Plan will be submitted directly by our contractor, Bhate Environmental.
2. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.
3. If you have any questions, please feel free to contact Mr. David Scruggs at (575) 572-5395.

  
A. DAVID BUDAK  
Deputy Base Civil Engineer

Attachment:  
Response to Comments Table site OT-14

cc:		
(w/Atch)	(w/o Atch)	(w/o Atch)
Mr. David Strasser	Mr. Will Moats	Ms. Laurie King
Hazardous Waste Bureau	Hazardous Waste Bureau	USEPA, Region 6 (6PD-F)
5500 San Antonio Dr. NE	5500 San Antonio Dr. NE	1445 Ross Ave., Ste 1200
Albuquerque, NM 87109	Albuquerque, NM 87109	Dallas, TX 75202-2733

Response to Comments  
 Voluntary Corrective Measures Work Plan  
 Site OT-14, November 2007  
 Holloman AFB, NM

Comment No.	Section	Page	Comment	Response
Author	Dezbah Tso NMED- Hazardous Waste Bureau, Santa Fe, NM		Date of Comments: May 08, 2008	Date of Response: <b>June 10, 2008</b>
1	Figures /Maps		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.	Concur. Each figure has been revised to include the site boundary for OT-14, and the projection (New Mexico State Plane Coordinate System, Central Zone, and the 1983 North American Horizontal Datum). Furthermore, the figures of the work plan are shown to scale and have a north arrow.
2	Sample Result Tables		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.	Concur. Tables 2-1 and 2-2 of the OT-14 Work Plan have been revised to include footnotes for all abbreviations, laboratory data quality flags and the significance of bold type (analytes above the NMED soil screening levels).  In addition, sample dates have been added and the analytical test methods have been checked and spelling errors corrected (e.g. "Chlorinated Herbicides" (Method 8150).
3	1	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.	Concur. The sentence in Section 1, page 1-1, 2 <sup>nd</sup> paragraph, last sentence has been revised to state, "...covered with an engineered asphalt cap." Furthermore, additional details regarding the engineered asphalt cap have been included in Section 2.1.3 (Asphalt Cap).
4	1	1-1, 3 <sup>rd</sup> paragraph, 5 <sup>th</sup> sentence	This sentence excludes methylene chloride (maximum concentration 32 micrograms per liter (ug/L)), which is one of the detected volatile organic compounds (VOCs) in groundwater, according to Table 2-2 and the first paragraph of	Concur. Section 1, page 1-1, 3 <sup>rd</sup> paragraph, 5 <sup>th</sup> sentence has been revised to include methylene chloride and it's maximum concentration (32 ug/L), as one of the detected VOCs in groundwater.

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			Section 2.1.1. The Permittee shall revise the sentence to include methylene chloride and it's maximum concentration.	
5	2	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 it's relationship with the proposed temporary monitoring well and position within the proposed excavation.	Concur. Figures 3-1 and 4-1 have been revised to show the location of telephone poles near the site that may impact the locations of soil borings and the excavation.
6	2.1.1	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 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 background levels and not a prior form of background levels.	<p>Concur. The 2<sup>nd</sup> to last sentence of the 1<sup>st</sup> paragraph in Section 2.1.1, was incorrectly stated and the reference to "background levels" has been deleted.</p> <p>It is currently anticipated that the <i>Basewide Background Study Work Plan, Holloman AFB, NM</i> will be implemented later this year. The primary objective of this Work Plan to develop new background values for naturally occurring inorganic constituents. The inorganic data collected during this investigation will be compared to the background values established in the upcoming Basewide Background Study.</p> <p>As there are no background levels currently established for groundwater at HAFB, the historical results cannot be compared to any background levels. The paragraph has been revised as follows;</p> <p>"Major dissolved anions (chloride, sulfate, fluoride, and nitrate) exceeded the NMWQCC human health standards for groundwater with a TDS concentration below 10,000 mg/L (New Mexico Administration Code [NMAC] 20.6.2).</p>

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				However, TDS concentrations in groundwater at site OT-14 ranges from 11,000 to 16,000 mg/L which exceeds the NMWQCC standard for potable groundwater (10,000 mg/L)
7	2.1.2	2-2, 2 <sup>nd</sup> paragraph,	<p>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 the 1991 Phase I RFI soil sample results. In fact, the discussion of the 1991 soil sample concentrations that exceed the NMED SSLs is notably absent from 2.1.1. Finally, the second paragraph's summary does not correspond to the data as presented in Table 2-1. Permittee must:</p> <ol style="list-style-type: none"> <li>Discuss the Phase I samples and their results in Section 2.1.1. The Phase I samples have numbers beginning SB-14-##.</li> <li>Discuss the Phase II samples and their results in Section 2.1.2. The Phase II samples have sample numbers beginning DP-14-##.</li> <li>Update Section 2, page 2-1, forth paragraph, second sentence to reflect the corrections discussed in Sections 2.1.1 and 2.1.2. The sentences currently states, "Analytical results from only three samples and two analytes exceeded the NMED Residential SSLs for pesticides." This sentence (Section 2, 4<sup>th</sup> paragraph, 2<sup>nd</sup> sentence) and any occurrence of this sentence in the document must be</li> </ol>	<p>Concur. A more detailed discussion on the Remedial Investigation and the RFI Phase II investigation has been included in the Work Plan:</p> <ol style="list-style-type: none"> <li>A discussion of the Remedial Investigation Phase I soil analytical results for samples SB-14-01 through SB-14-05 has been added to section 2.1.1.</li> <li>The RFI Phase II soil analytical results (DP-14-01 through DP-14-12) have been discussed in further detail in Section 2.1.2.</li> <li>Section 2, last paragraph, second sentence has been revised to correctly state that "five samples including three analytes have exceeded the current NMED Residential SSLs.</li> </ol>

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			corrected to read "five samples" and "three analytes."	
8	3.2	3-2	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.	Concur. Added reference to the AFCEE, <i>ERPIMS '98 Data Loading Handbook, Version 4.0</i> .
9	3.2	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.	The HAFB SOPs (SOP-1 through SOP-10) were submitted in Appendix A of the, <i>Final Basewide Quality Assurance Project Plan, Holloman Air Force Base, New Mexico, Bhate 2003</i> . The HAFB Basewide QAPP was submitted to the NMED-Hazardous Waste Bureau (Ms. Sandra Martin) on November 19, 2003.
10	3.2.1	3-3	The Work Plan states that soil and groundwater samples will be submitted for analysis of total petroleum (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 the information posted on the Accutest Laboratories website ( <a href="http://www.accutest.com">www.accutest.com</a> ), 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 version 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	Accutest performs USEPA Method 8015B for TPH-GRO/DRO/ORO analysis. "M" stands for modified and is from earlier revisions. ORO is not addressed on the Accutest website but is specified per States/Agencies requiring it. Therefore, we have established with the lab (Accutest) that GRO,DRO, and ORO are to be analyzed and reported in accordance with our contract requirements.  Therefore, the text has been revised to state the TPH (GRO/DRO/ORO) will be analyzed, "...by modified USEPA Method 8015B." Furthermore all applicable tables of the Work Plan, and Tables 3-2, 4-1, and 4-2 of the QAPP, have been revised to state EPA Method 8015B.

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			must clarify the meaning of "modified USEPA Method 8015M" and specify whether this modified method is based upon USEPA Method 8015B or 8015C.	
11	3.2.1 & 3.2.2	3-3, last paragraph & 3-4, last paragraph	<p>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 duplicates sample 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:</p> <p>a) Update both paragraphs to include two trip blanks, one matrix spike/matrix spike duplicate sample, and the total number of samples.</p> <p>b) Update Table 4-1 (Appendix B) to include two trip blanks, two field duplicate samples, and update the number of samples.</p> <p>c) Include equipment blanks as described in Comment 52.</p>	<p>Concur. The following corrections have been made to the Work Plan:</p> <p>a) Both paragraphs (section 3.2.1, page 3-3, last paragraph and section 3.2.2, page 3-4, last paragraph) have been revised to include the QC samples (two trip blanks [estimated one trip blank per VOC shipment] and one MS/MSD sample).</p> <p>b) Table 4-1 (Appendix B) has been revised to include two trip blanks, two field duplicates. In addition, the total number of samples for each analysis has also been updated.</p> <p>c) Per the response to comment (RTC) 52, equipment blank samples will not be required as disposable sampling equipment will be utilized for all sampling activities.</p>
12	3.2.2	3-3 & 3-4, 1 <sup>st</sup> , 2 <sup>nd</sup> , and 4 <sup>th</sup> paragraphs	<p>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</p>	<p>Concur. Section 3.2.2 has been revised to clarify that the estimated depth of each boring will be 15' bgs. Each boring will be continuously sampled and screened using headspace screening techniques to determine sample intervals. One</p>

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			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.	sample will be collected at the 0-2 foot interval and a second sample will be collected at the interval with the highest OVA readings or where there is odor indicating contamination. In the absence of elevated OVA readings the second sample will be collected just above the water table (estimated to be approximately 4-6 feet bgs).
13	3.2.2	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.	Concur. The text has been revised to state that the horizontal coordinates will use the North American Horizontal Datum 1983. Furthermore, a sentence has been added to establish that no vertical elevations will be recorded for the purpose of soil boring locations.
14	3.2.2.1	3-5	Section 3.2.2.1, Table 3-1, and 4-1 of Appendix B states that the American Society for Testing and Materials (ASTM) Method D1429 will determine soil sample specific gravity. According to a review of the ASTM methods at <a href="http://www.astm.org">www.astm.org</a> , the chosen method appears inconsistent with it's intent at OT-14. ASTM D1429 is entitled "Standard Test Method for Specific Gravity of Water and Brine," and it's purpose is to "cover the determination of the specific gravity of water and brine free separable oil." Additionally, ASTM D1429, which contains several methods, applies to "clear waters of those containing only a moderate amount of particulate matter, sea water of brines," and "samples of water containing water or	<p>a) ASTM D1429 comprises Methods A-D which is applicable not only to clear waters but to solid matter such as mud and sludge. Since specific gravity is basically the ratio between the weight of a sample at a specific temperature to that of an equal volume of reagent water at the same temperature, this procedure utilizing the pycnometer or Erlenmeyer flask, is sufficient to determine specific gravity of soil matrices.</p> <p>b) Accutest uses ASTM D1429-86 (revision 1986). Therefore, the text will be revised to state the appropriate revision. Furthermore, Tables 3-1 of the work plan and 4-1 of Appendix B, have been revised to state ASTM</p>

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			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, dates 1986) or the most recent version (ASTM D1429-03, dated 2003).	D1429-86.
15	3.2.3	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 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.	Concur. The 2 <sup>nd</sup> paragraph of Section 3.2.3 has been revised to state that, “Following sampling, the temporary monitoring well will remain onsite until all analytical data relative to the well has been reviewed. Once permission has been obtained from NMED the well will be completely removed from the ground and the borehole will be sealed in accordance with HAFB SOP-10.” Additionally, text has been added to the 2 <sup>nd</sup> paragraph of Section 3.2.3 to clarify that a flush mounted traffic cover will, “...protect the well, from surface water infiltration and damage due to vehicles and heavy equipment, for future use if necessary.”
16	3.2.3	3-5, 3 <sup>rd</sup> paragraph	The paragraph incorrectly 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.	Concur. The 3 <sup>rd</sup> paragraph of Section 3.2.3 has been revised as follows. a) Text has been added to clarify that, “Prior to sampling each of the wells will be purged with a peristaltic pump, utilizing low flow techniques. During purging of the 5 wells, a multi-parameter Sonde with a flow through cell, will be used to collect water quality parameters (pH, conductivity, dissolved oxygen, and temperature). Water quality parameters will be recorded in a Monitoring Well

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				<p>Sample Collection Log.”</p> <p>b) Table 3-2 (Groundwater Sampling and Analysis), of this work plan has been revised to include field screening of groundwater samples. Field parameters (Conductivity, DO, temperature, and pH) have been added to the analyses to be performed at each groundwater monitoring well.</p> <p>c) Text has been added to clarify the total number of groundwater samples (5), and the number of duplicate, trip blank, and MS/MSD samples.</p>
17	3.2.3	3-5, 3 <sup>rd</sup> paragraph, Table 3-2 and 4-1 (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).	Concur. Per comment 11, the text has been revised to read; “A total of 6 groundwater samples including, one duplicate sample will be collected from the 4 existing and 1 temporary monitoring well,. In addition, one MS/MSD, and one trip blank for each shipment of VOC samples will be submitted to the laboratory for analysis.” Per the RTC for comment 52, no equipment blanks will be necessary. Table 3-2 of the Work Plan and Table 4-1 of Appendix B have both been revised to be consistent with the total number of samples and the number of QC samples to be collected at Site OT-14.
18	3.2.3.1	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.	Concur. The text has been revised as follows, “... relative to the State Plane Coordinate System, New Mexico Central, North American Horizontal Datum 1983”.
19	3.2.3.1	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	Concur. The sentence has been revised to state, “...all maps will include a coordinate system and datum (e.g., New Mexico Central, North American Horizontal Datum 1983), north arrow, scale, and the site boundaries.”

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			Datum, 1983 North American Vertical Datum). Permittee must revise the sentence to include these requirements.	
20	3.3	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 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.	Concur. No groundwater samples will be collected directly from a DPT borehole. At DPT boring location OT14-DP-15, a 1-inch temporary monitoring well will be installed and sampled.  The 1 <sup>st</sup> sentence, 2 <sup>nd</sup> paragraph has been revised; “The sample identification nomenclature for groundwater samples collected from temporary monitoring wells installed into direct push boreholes will be as follows;”
21	3.4	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.	Concur. A paragraph has been added to the end of Section 3.4 to clarify the analysis that will be completed on IDW samples collected for disposal determination.
22	3.4	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.	Concur. The 2 <sup>nd</sup> to last sentence of Section 3.4 has been revised to state that, “...other liquid wastes, such as decontamination rinses, will be handled as if contaminated and containerized pending laboratory analysis. If the laboratory results indicate analyte concentrations exist below target concentrations, the liquid wastes may be disposed of via the HAFB WWTP.”

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			The Permittee shall alter the sentence to comply with these conditions.	
23	3.4.1	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 this sentence.	Concur. The 3 <sup>rd</sup> sentence of Section 3.4.1 was revised as follows: a) A sentence was added to clarify the containers to be used, "Decontamination water will be collected into 5 gallon bucket containers." b) The sentence referenced above clarifies what kind of containers will be used. c) The phrase, "either allowed to evaporate or," has been removed. d) The phrase, "pending laboratory analysis" has been added to the end of this sentence.
24	3.4.1	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	Concur. The text has been revised as follows: a) Removed phrase, "either evaporated or," from Section 3.4.1, Section 3-7, last sentence. b) Added text clarifying that liquid waste will be containerized and removed for characterization. c) Added text, "Disposal of soil will depend on laboratory analysis and will either be transported offsite to an appropriate disposal facility, or spread on the ground if the analytical results indicate the soil is suitable for use as backfill"

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			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	3.4.2	3-7, 1 <sup>st</sup> sentence	This sentence states, "Prior to disposal, used PPE, disposable items, and the decontamination pad liner will be rinsed clean with tap water and diluted with detergent solution." The Permittee must describe collection, management, and characterization of the water and detergent solution.	Concur. A sentence has been added to describe the collection management and characterization of the waste water/detergent rinse. The following sentence was added to Section 3.4.2, page 3-7, "Rinse water will be collected into 5 gallon buckets and combined with other decontamination water that will be characterized and disposed of properly, pending laboratory analysis."
26	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 occurs. 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.	Concur. A paragraph has been added at the end of Section 4.1.3 Excavation Area Site Safety to mention dust suppression and references Appendix A of the Work Plan.
27	4	4-1, 1 <sup>st</sup> paragraph, 2 <sup>nd</sup> to last sentence	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 feet, and be less than 9 feet..." The Permittee must revise each sentence to state clearly and consistently the expected depth of excavation.	Concur. The "estimated" depth of the excavation is approximately 2 feet beneath the asphalt cap, based on historical data. Section 9, last sentence is referring to the fact that any excavation deeper than 4 feet may require engineering controls for safety (i.e. benching). To clarify this fact the sentence will be revised as follows, "Excavation depths are not expected to exceed 2 ft, however soil will be removed until clean confirmatory samples are collected which could potentially extend the excavation below 4 ft bgs; therefore sidewall benching may be required."

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28	4.2	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.	Concur. Details regarding the decontamination process have been added to Section 4.2, page 4-2.
29	4.3.1	4-3, last sentence	<p>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 (ug/kg) exceeded the NMED SSL for heptachlor (1,080 ug/kg) and 14-DP-12 (26,000 ug/kg) exceeded the NMED SSL for chlordane (16,200 ug/kg). The Permittee must:</p> <ol style="list-style-type: none"> <li>Explain the exclusion of the two sample locations from the excavation plan.</li> <li>Alter the excavation description to include both sampling locations.</li> <li>Modify Figure 4-1 to include both sampling locations and the changes listed in Comment 5 and the General Comment 1.</li> <li>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.</li> <li>Update the calculation of the proposed excavated soil listed in Section 2.2, 2<sup>nd</sup> paragraph, 1<sup>st</sup> sentence, which</li> </ol>	<p>Concur. The following revisions have been made to address the location of the "Potential Excavation Area":</p> <ol style="list-style-type: none"> <li>The initially proposed excavation area failed to account for the soil samples collected at DP-14-10 and DP-14-12, therefore the proposed excavation area has been enlarged to include this area (northeast of building 66).</li> <li>The last sentence of Section 4.3.1, has been revised as follows to account for the additional area of the proposed excavation, "...would most likely be limited to the area north, northeast and northwest of Building 66 as shown on Figure 4-1".</li> <li>Figure 4-1 has been revised by adjusting the "potential excavation area" to include soil located around historical soil samples DP-14-10 and DP-14-12, adding the location of telephone poles on site that could potentially affect the location of the excavation area (per Comment 5), and adding the coordinate system and datum (per Comment 1).</li> <li>The sample nomenclature for both Table 2-1 and Figure 4-1 are consistent with historical data. The <i>Draft Final Phase II RCRA Facility Investigation Report</i> displayed the data in Table 4.6-2 as DP-14-01 through DP-14-12, and presents the location IDs on Figure 4.6-1) as 14-DP-01 through 14-DP-12, therefore the sample nomenclature</li> </ol>

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			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.	presented in Table 2-1 and Figure 4-1 is correct. To minimize confusion the borehole ID numbers (14-DP-01 through 14-DP-12) presented in Figure 4-1 are now included in Table 2-1 of the OT-14 VMC Work Plan. In addition, the original Table 4.6-2 and Figure 4.6-1 from the OT-14 RFI Report have been included in Attachment B (new) of the OT-14 VCM Work Plan. e) The calculated area in Section 2.2, 2 <sup>nd</sup> paragraph, 1 <sup>st</sup> sentence has been revised to read,, "...it appears that approximately 400 cu yds of soil may have exceeded the NMED SSLs..."
30	4.3.3	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.	Concur. At the end of the 3 <sup>rd</sup> sentence of Section 4.3.3 a reference "(Sections 5.1.1 and 5.1.2, of this work plan, provide further details regarding overburden screening and sampling)" has been added.
31	4.3.3.1	4-3, 4 <sup>th</sup> sentence	The sentence states "Samples will be collected at a minimum frequency of 2 per 18 liner 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.	Concur. The 4 <sup>th</sup> sentence of Section 4.3.3.1 has been revised as follows, "Confirmatory soil samples shall be biased to areas with the greatest potential for contamination and collected at a minimum frequency of 2 per 18 linear feet (ln ft) per side wall at mid-depth of the contamination zone."
32	4.3.4	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 confirmatory sampling confirms the absence of contaminated soil. This may	Concur. At the beginning of Section 4.3.4, two sentences have been added to clarify that, "Backfilling will not begin until confirmatory sampling confirms the absence of contaminated soil exceeding the NMED Residential SSLs. Additional excavation may be required until these conditions are met."

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			require additional excavation and confirmatory sampling based upon the results of the first round and subsequent rounds of confirmatory sampling.	
33	4.3.5	4-4, 1st 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.	Concur. The 1 <sup>st</sup> sentence of Section 4.3.5 has been revised to define TCLP as follows, "Contaminated soil will be transported to the appropriate offsite facility based upon the soil sample analytical results and the toxicity characteristic leaching procedure (TCLP) analysis." Furthermore, a sentence was added, "Section 5.1 of this work plan, provides further details regarding the TCLP sampling of soil to be disposed of at offsite facilities", to refer to Section 5.1. It is not necessary to reference Section 5.1.3 in Section 4.3.5 (Soil Disposal) as Section 5.1.3 only addresses excavation sidewall sampling not soil for offsite disposal.
34	5.1.1	5-1	The Permittee must include reference to Table 4-1 in this Section.	Concur. A reference to Table 4-1 has been added at the end of section 5.1.1.
35	5.1.2 and 5.1.3	5-1	The Permittee must include reference to Table 5-1 in these sections.	Concur. A reference to Table 5-1 has been added at the end of Sections 5.1.2 and 5.1.3.
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.	Concur. The holding time for Mercury is 28 days. Therefore, Table 5-1 has been revised to include the 28 day holding time in the RCRA and TCLP metals column.

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37	6.1 and 6.2.4	6-1 and 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.	Concur. All naturally occurring inorganic constituents (e.g., metals) will be compared to the soon-to be established background levels for HAFB. New text has been added in Sections 6.1 and 6.2.4 regarding comparison of the analytical data (soil and groundwater) that will be collected during the OT-14 VCM with the background levels that will be established from the <i>Basewide Background Study, HAFB, New Mexico (Bhate 2008)</i> .
38	6.1	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 <i>New Mexico Environmental Department TPH Screening Guidelines, October 2006 (NMED, 2006b)</i> , to differentiate TPH screening levels from soil screening levels in the <i>Technical Background Document for Development of Soil Screening Levels, Revision 4.0, June 2006 (NMED, 2006a)</i> . 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).	Concur. The work plan has been revised as follows: a) A reference to the NMED TPH Screening Guidelines has been added as follows, "...TPH analytical results will be compared to the <i>NMED TPH Screening Guidelines, October 2006 (NMED, 2006b)</i> for petroleum hydrocarbons." b) The References section has been updated to include the <i>New Mexico Environmental Department TPH Screening Guidelines, October 2006 (NMED, 2006b)</i> . And all call outs to either of these two documents has been updated to clarify either NMED, 2006a or NMED, 2006b. c) A paragraph has been added in Section 6-1 to describe the use of groundwater data and the standards that will be used for comparison: "Analytes detected in groundwater will be evaluated against groundwater standards set forth in the <i>New Mexico Administration Code (NMAC) 20.6.2, New Mexico Water Quality Control Commission (NMWQCC) Regulations, September 15, 2002 (NMAC 20.6.2)</i> , and the USEPA maximum contaminate levels (MCLs)."

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39	6.2	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.	Concur. The 2nd sentence of Section 6.2 has been revised to, "The risk based evaluation will be included in the submittal of the Site OT-14 Accelerated Corrective Measures Completion Report."
40	6.2.4	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 it's 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 <i>Technical Background Document for Development of Soil Screening Levels, Revision 4.0</i> , 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.	Concur. The following revisions have been made: a) Text has been added to state that maximum concentrations of each COPC will additionally be compared to, "...the NMED TPH screening guidelines (NMED, 2006b), and the yet to be established background concentrations." b) A sentence has been added to clarify that, maximum concentrations in groundwater will be, "...compared with the NMWQCC groundwater standards, USEPA MCLs, and the soon-to-be established groundwater background levels.
41	7.1.1	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, 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.	Concur. Metals has been added to the list of constituents, in the last sentence of Section 7.1.1, that will be evaluated prior to using overburden as backfill.
42	7.2	7-1	The Permittee will refer to Comments 23 and 24, regarding decontamination water, and modify this section accordingly.	Concur. Section 7.2 (Decontamination Water) has been revised as follows: "Decontamination water will be handled as if contaminated and containerized into 55 gallons drums or a frac tank,

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				pending laboratory analysis. If the laboratory results indicate analyte concentrations exist below target concentrations, the liquid wastes will be disposed of via the HAFB WWTP.”
43	7.3	7-1	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, 1st 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 Sections 3.4.2 (including all revisions required by comments) regarding PPE handling.	Concur. Section 7.3 has been revised as follows, “Prior to disposal, used PPE, disposable items, and the decontamination pad liner will be rinsed clean with tap water and diluted detergent solution. Rinse water will be collected into 5 gallon buckets and combined with other decontamination water that will be characterized and disposed of properly, pending laboratory analysis. Cleaned PPE and presumed clean, based upon non-contact with contaminated soils, water, or equipment, and other disposable clean items will be contained in trash bags and disposed of at the applicable onsite sanitary waste receptacle”, to be consistent with Section 3.4.2. Furthermore, the last sentence of Section 3.4 was revised to refer to Section 3.4.2, for handling and disposal of used PPE.
44	8.3.4	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.	Concur. The 2 <sup>nd</sup> sentence of Section 8.3.4 has been revised to state, “In accordance with the USACE <i>Environmental Quality- Chemical Quality Assurance for Hazardous Toxic and Radioactive Waste (HTRW) Projects, Engineer Manual, EM 200-1-6</i> (USACE, 1997), the investigative data is classified as definitive data.” Furthermore, the document has been added to the list of references.
45	8.3.4	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 the “VCM Report” to “Accelerated Corrective Measures Completion Report”.	Concur. The 2 <sup>nd</sup> to last sentence has been revised to state an “Accelerated Corrective Measures Completion Report” instead of VCM report.

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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.	Concur. Field screening (OVA headspace screening) of soil borings has been added to Table 3-1. In addition, groundwater field screening water quality parameters (pH, conductivity, dissolved oxygen and temperature) have been added to Table 3-2 of this Work Plan.
47	Appendix A, 2	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 Environmental Department (NMED) Residential Soil Screening Levels (SSLs) for pesticides." This summary is inconsistent with the data results, as described in Comment 7. The Permittee shall refer to Comment 7 for guidance on correcting and revising the sentence.	Concur. The 2 <sup>nd</sup> sentence of the 3 <sup>rd</sup> paragraph in Section 2 in Appendix A (HASP Addendum) has been revised per Comment 7 to state, "...five samples and three analytes..."
48	Appendix A, 3.1	3-1, Table 3-1	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: <ul style="list-style-type: none"> <li>• Methylene chloride</li> <li>• 2,4-D</li> <li>• 4,4-DDD</li> <li>• 4,4-DDE</li> </ul>	Concur. The tables in question (Table 3-1 and Attachment B of Appendix A [Properties of CPOC]), only took into account BTEX constituents and pesticides that exceeded NMED SSLs from historical data. Therefore, the Attachment B (Properties of COPC) table has been revised to include Methylene chloride, aldrin (dieldrin), 2,4-DB, 4,4-DDD, and 4,4-DDE, which didn't exceed SSLs but were found in "elevated" concentrations and could potentially be present at site OT-14.
49	Appendix A, 6.2	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).	Concur. Table 6-3 of Appendix A, has been revised to state that disposable PPE will be decontaminated if needed and that decontamination rinses will be containerized and disposed of pending laboratory analysis. Furthermore, the table has been

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			The Permittee must revise Table 6.2 of Appendix A to contain all decontamination procedures described in the Work Plan,	revised to state that soils derived for dry decontamination of heavy equipment and hand tools will be disposed of with the excavation soils pending laboratory analysis.
50	Appendix A, 7	7-1	The second sentence states, "Site communication amongst workers shall be a combination of verbal and line of site hand signals." 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, should either be necessary. The Permittee shall revise the section to include communications with and among heavy equipment operators.	Concur. Section 7 last paragraph has been revised as follows, " <b>Cellular telephone use is not permitted while operating equipment.</b> However, in the event of an emergency, the support zone may contact operators of heavy equipment with hand held radios or cellular phones. In addition all workers will use the buddy system (at no time will an individual work alone) to assist in communication between operators and other essential personnel in the exclusion zone."
51	Appendix B, 3	Table 3-2	Table 3-2 of Appendix B summarizes the definitive data for soil and groundwater samples. The table dose not list any data related to investigation derived waste characterization; TCLP is not included among the parameters. The Permittee will revise table to include all definitive data described in the Work Plan.	Concur. Table 3-2 of Appendix B, has been revised to take into account the TCLP analysis that may be done on waste requiring offsite disposal.
52	Appendix B, 4	Tables 4-1 and 4-2	Neither Table 4-1 nor Table 4-2 of Appendix B lists any equipment blanks. The equipment blanks help 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 3.21,3.2.3, 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.	Based on the fact that Direct Push Technology (DPT) drilling techniques will be used, no equipment blank samples will be necessary, per Section 8.9 of the <i>HAFB Basewide QAPP</i> . DPT drilling utilizes dedicated disposable liners and sampling supplies so that the soil sample never touches re-usable equipment. For groundwater sampling, dedicated polyethylene tubing will be utilized as well and disposed of after each sample is collected. Therefore no non-dedicated equipment will be used and no equipment blank samples are expected for the investigation activities at Site OT-14.

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53	Appendix B, 4	Table 4-3	<p>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 the 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 NMWQCC standards. The Permittee must:</p> <p>a) Obtain new, lower reporting limits from Accutest or contract with a laboratory that can provide lower limits.</p> <p>b) Revise Table 4-3 of Appendix B, listing the new reporting limits, including comparison to evaluation criteria, chemical abstracts (CAS) numbers for all analytes, and properly spelled, legible words (e.g., truncated words appear in the table).</p>	<p>a) Please note that the laboratory reporting limits for soil are listed in ug/kg. The pesticides section was incorrectly listed as mg/kg and will be changed to the correct ug/kg. Otherwise, the NMED SSLs are in mg/kg. Therefore, all RLs listed in the table appear to be lower than their respective NMED SSLs. Additionally, it is noted that, 2 SVOCs (benzo(a)pyrene and hexachlorobenzene) had RLs that were above the EPA MCLs. However, these 2 SVOCs are not chemicals of potential concern and have not been historically detected at Site OT-14.</p> <p>b) Table 4-3 has been revised as follows: Added columns for soil and groundwater evaluation criteria (NMED SSLs, NMWQCC groundwater standards, and EPA MCLs), and added a column for CAS numbers for each individual chemical. As for the "truncated" words in table 4-3, chemical compounds contain numbers as a reference to where the functional group(s) are attached as well as often times being abbreviated for ease of identification. Therefore, the chemical names are listed as the lab (Accutest) will report them. Additionally, Table 4-3 has been reformatted so that all the analytical methods are legible and properly spelled.</p>
			End of Comments	