



UNTERED

DEPARTMENT OF THE AIR FORCE

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

25 AUG 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 19 June 08 Notice of Disapproval: Partial Response to Notice of Deficiency on SWMU Assessment Report, Septic Tanks March 13, 2008 Holloman AFB, NM6572124422 HWB-HAFB-07-005

1. Holloman AFB's response to comments for subject report is attached and is hereby submitted to NMED for review and approval.
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

Global Power for America

7007 1490 0000 7438 6794

cc:

(w/Atch)

Mr. David Strasser
Hazardous Waste Bureau
5500 San Antonio Dr. NE
Albuquerque, NM 87109

(w/o Atch)

Mr. Will Moats
Hazardous Waste Bureau
5500 San Antonio Dr. NE
Albuquerque, NM 87109

(w/o Atch)

Ms. Laurie King
USEPA, Region 6 (6PD-F)
1445 Ross Ave., Ste 1200
Dallas, TX 75202-2733

Response to NMED's Comments Submitted 19 June 2008 and Received 25 June 2008 on
 Notice of Disproval: 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

Item #	NMED Comment	HAFB Response
1.	<p>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.</p>	<p>Holloman AFB plans to submit the Draft Work Plan to NMED for review and approval by 31 September 2008. The Draft Work Plan will include available information on the status of all inactive and removed septic tanks. It should be noted, per comment 7 below, that NMED has already identified the septic sites that require additional information to determine if investigation is necessary and sites where available information has been submitted to NMED allowing a determination as to whether or not additional investigation is required. The Draft Work Plan will include the requested information for sites where additional information is required allowing NMED to determine if investigation is necessary and the extent of potential investigation.</p>
2.	<p>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</p>	<p>Holloman AFB adjusted and revised the "Septic Tank Map Location and Status" table to show that the septic tanks at Buildings 1219, 1226, 1235, and 1239 are still active. It is noted that before any of the above listed septic tanks are deactivated or removed, NMED will be notified within 90 days of these activities. The adjusted and revised "Septic Tank Map Location and Status" table is included as</p>

	changed status of these systems.	an attachment to depict the actual investigatory status of these septic systems, as well as other 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 “ <i>Septic Tank Map Location and Status</i> ” table that was submitted with the map volume of the SAR to add this building to the list of inactive septic systems.	Holloman AFB will provide the location of Building 702 and the description of historical activities associated with this building within the Draft Work Plan to be submitted 31 September 2008, allowing NMED to determine if this system will require further investigation. The attached revised “ <i>Septic Tank Map Location and Status</i> ” table includes the appropriate status information with respect to the septic tank located at Building 702, also to be submitted with the Draft Work Plan.
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 “ <i>Septic Tank Map Location and Status</i> ” table that was submitted with the map volume of the SAR to add this building to the list of removed septic systems.	Holloman AFB will provide the locations of these buildings along with a description of the historical activities associated with Building 638, 642, 1142, 1168, 1155, and 1269 within the Draft Work Plan to be submitted 31 September 2008.
5.	Comment #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”X17” (folded, multiple sheets).	Attachment #23 or other appropriate figure(s) will be resubmitted legibly on 11”X17” paper within the Draft Work Plan on 31 September 2008.
6.	Comment #4: The response to this comment only addressed those buildings at the south end of the test track, which 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	All buildings that are located along the entire length of the test track and OT-37 presently or historically using septic system will be discussed with locations shown in the 31 September 2008 Draft Work Plan.

	<p>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 “<i>Septic Tank Map Location and Status</i>” table that was submitted with the map volume of the SAR to add these buildings to the list of septic systems.</p>	<p>The attached revised “<i>Septic Tank Map Location and Status</i>” table indicate that additional information is required for NMED to determine if septic systems associated with these sites will require further investigation(s) that will be provided in the Draft Work Plan.</p>
<p>7.</p>	<p>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 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 <u>may</u> 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.</p> <p>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</p>	<p>See response to comment #1 above pertaining to this comment as noted. Sites currently identified as those requiring further investigation will undergo applicable investigation. Sites currently identified as those requiring additional further preliminary research in order to determine if investigation is required will have all available information presented in the Draft Work Plan, allowing NMED to determine which of these sites will ultimately require investigation at that stage. Additionally, sites are categorized as to the current understanding if investigation is required, if additional information is required for NMED to determine if septic systems require further investigation, and those where investigation is not required and are shown in the attached revised “<i>Septic Tank Map Location and Status</i>” table.</p> <p>All required drawings/figures submitted in the Draft Work Plan will legible and comply with the 11”X17” folded size criteria.</p>

	<p>than 11”X17”, 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.</p>	
8.	<p>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 “<i>Septic Tank Map Location and Status</i>” table that was submitted with the map volume of the SAR to add this building to the list of septic systems.</p>	<p>Locations and descriptions of the septic tanks at Buildings 639, 640, 700, 1142, 1158, 1174, 1178, 1179, 1180, and 1183 will be included in the 31 September 2008 Draft Work Plan. The “<i>Septic Tank Map Location and Status</i>” table has been updated with these sites included and is presented as an attachment.</p>
9.	<p>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.</p>	<p>Appropriate drawings, as available, showing all drains and sumps that could flow into septic systems will be provided in the 31 September 2008 Draft Work Plan. In addition to the drawings/figures, each building associated with each septic system will be visited to help determine floor drain/sump conditions.</p>
10.	<p>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.</p>	<p>No additional information was obtained to indicate that septic systems associated with Buildings 1091 and 1097 should be included as sites requiring further investigation.</p>
11.	<p>Comment #8: As indicated in item #7 above, the Permittee is advised that the blueprints submitted in the response to this comment as attachments are not acceptable. All drawings submitted with the</p>	<p>All required drawings/figures submitted in the Draft Work Plan will be legible and comply with the 11”X17” folded size criteria.</p>

	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 <u>may</u> need to be investigated.	The septic tank system will be further investigated and be addressed in the Draft Work Plan to be submitted 31 September 2008. The 31 September 2008 Draft Work Plan will include sampling for TPH, VOC, SVOC, and TAL metals from both soils and the content of the septic tank (if fluids are present) for this site.

Septic Tank Map Location and Status

4 August 2008

ACTIVE SEPTIC SYSTEMS

No	Bldg Number	Year Completed	Dimensions	Capacity	Investigation Category
1	149	1998		1000	3
2	312	1994		1000	3
3	375	1968		500	3
4	882				3
5	864 (863)	1994	5'x8'x6'4"	750	3
6	885	1970	7'10"x4'8"x6'10"	1000	3
7	886				3
8	887	1991		1000	3
9	923	1959	4'2"x7"x7'9.5"	1600	3
10	1022	1992		1200	3
11	1066	1994		1000	3
12	1160	1957	5'x12'4"x7'6"	1500	3
13	1161	1957		750	3
14	1162	1957		350	3
15	1163	1957		350	3
16	1169	1962		1680	3
17	1195	1962		1260	3
18	1256	1970	12'8"x4'8"x5'		3
19	1270				3
20	1271				3
21	1278	2004		1250	3
22	1625				3
23	75600	1989		1200	3
24	La Luz Gate (1290)(1292)	2004		1250	3
25	1219	1985	5'4"x10'6"x8'4"		3
26	1226	1985	5'6'2"x6'		3
27	1235	1986		1189	3
28	1239	1977	4'6"x8'6"x6'	750	3
29	1284				3

INACTIVE SEPTIC SYSTEMS

No	Bldg Number	Year Completed	Dimensions	Capacity	Investigation Category
1	308	1965			1
2	639				2
3	640				2

4	700				2
5	702				2
6	920	1959	4'2"x7"x7'9.5"	1600	2
7	921	1959	4'2"x7"x7'9.5"	1600	2
8	922	1959	4'2"x7"x7'9.5"	1600	2
9	924	1959	4'2"x7"x7'9.5"	1600	2
10	1091	1969	6'8"x3'x8'5"		3
11	1097	1987	5'10"x5'x7'8"	1672	3
12	1142				2
13	1158				2
14	1174				2
15	1178				2
16	1179				2
17	1180				2
18	1183				2
19	1190	1952	9'x4'x8'10"	3000	1
20	1194	1987	4'x4'x8'10"	1350	1
21	1196	1993	4'6"x11'x6'	1300	2
22	1199	1957		500	1
23	1200	1954	4'x8'x4'	1000	1
24	1201	1951	2'6"x6'6"x5'5"	650	1
25	1221	1983	4'8"x9'4"x6'2"	1100	1
26	1250	1957		350	3
27	1251				1

REMOVED SEPTIC SYSTEMS

No	Bldg Number	Year Completed	Dimensions	Capacity	Investigation Category
1	638				2
2	642				2
3	702				2
4	1102	1952	6'x4'x8'10"	2500	3
5	1103	1948	7'x9'x3'2"	1412	3
6	1108	1958	6'x9'6"x6'3"	750	3
7	1119				3
8	1142				2
9	1150	1953	4'x9'x6'3"	2500	3
10	1154				3
11	1155				2
12	1166	1960		450	2
13	1168				2
14	1175	1949	5'1"x10'4"x6'10"	2970	2

15	1176	1959		640	2
16	1265	1992		1200	3
17	1173				2
18	1269	1966	4'6"x9'	500	2

AREAS TO BE INVESTIGATED

No	Site	Bldg Number	Dimensions	Capacity	Investigation Category
1	Entire Length of Track	Additional to 1166, 1173, 1175, 1176			2
2	Early Missile Test Site (OT-37)	1142			2

Key:

Investigation Category:

- 1 – Further site investigation required.
- 2 – Further preliminary research required allowing NMED to determine if investigation category 1 or 3 is appropriate.
- 3 – Further site investigation or further preliminary research not required.