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NEW MEXICO  
ENVIRONMENT DEPARTMENT

*Hazardous Waste Bureau*

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ENTERED



RON CURRY  
Secretary

JON GOLDSTEIN  
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 22, 2009

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

**SUBJECT: NOTICE OF DISAPPROVAL: RCRA FACILITY INVESTIGATION  
WORK PLAN, SWMUS 122 AND 123, NOVEMBER 2008  
HOLLOMAN AIR FORCE BASE, NM6572124422  
HAFB-08-009**

Dear Mr. Scruggs:

The New Mexico Environment Department (NMED) has reviewed the RCRA Facility Investigation Work Plan for solid waste management units (SWMUs) 122 and 123, which was submitted for the performance of additional site characterization at these sites by 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.

**COMMENTS**

1. The Permittee must submit a new figure(s) showing the locations of all existing and former soil borings and monitoring wells and the results of analyses that were/are above soil and groundwater action levels.
2. The Permittee must revise Figures 1-1, 1-2, 1-3, 6-1 and 6-2 to show which datum

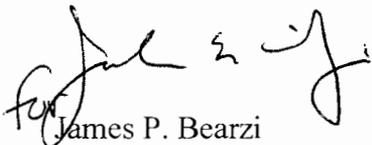
projection was used (e.g., New Mexico State Plane Coordinate System, Central Zone, 1983 [ft]).

3. The Permittee must revise the Work Plan to include evaluation of inorganic constituents detected in soil above the reporting limit against the soon-to-be established base-wide background concentrations. The maximum detected concentration for each contaminant that is detected above the reporting limit must be used. These comparisons will then be used to determine the site hazard index, which must be less than 1.0. Any contaminant concentrations above the soil screening levels cannot be screened out.
4. The Permittee must provide an explanation of the approach to be used to conduct a risk assessment, should one be required. This explanation shall include the use of background concentrations as discussed above.
5. The Permittee must provide a table showing all analyte holding times.

Please submit the required information in the form of a revised Work Plan that incorporates all the responses to the above NOD indicating added information in highlights, and deleted information in strikeouts, and on CDs compatible with Microsoft Word. Further, in order to expedite review of the responses, provide a matrix of the comments and HAFB responses. This response must be provided within sixty (60) days after receipt of this letter.

If you have any questions regarding this NOD or if you would like to discuss the comments prior to your response, please contact David Strasser of my staff at (505) 222-9526, or at the above address.

Sincerely,



James P. Bearzi  
Chief  
Hazardous Waste Bureau

cc: J. Kieling, NMED HWB  
W. Moats, NMED HWB  
C. Amindyas, NMED HWB  
D. Strasser, NMED HWB  
L. King, EPA, Region 6 (6PD-F)  
File: HAFB 2009 and Reading  
HWB-HAFB-08-009