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NEW MEXICO
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Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 31, 2009

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

**SUBJECT: NOTICE OF DISAPPROVAL: BASEWIDE SEPTIC TANK SOLID
WASTE MANAGEMENT UNITS, RCRA FACILITY INVESTIGATION
WORK PLAN, JANUARY 2009
HOLLOMAN AIR FORCE BASE, NM6572124422
HAFB-09-003**

Dear Mr. Scruggs:

The New Mexico Environment Department (NMED) has reviewed the above referenced Work Plan, which was submitted for the performance of additional investigations and site characterization activities at septic system sites throughout Holloman Air Force Base (the Permittee). 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.

SPECIFIC COMMENTS

1. **Table of Contents, Page i, Item 3.2.6; Page 3-9, Section 3.2.6, Header; and Figure 3-2, Final Block of Decision Tree**

The Permittee shall revise "Remedial Investigation Report" to read "RCRA Facility Investigation Report".

2. **Page 1-1, Section 1, 1st Sentence**

This sentence states that “Additional investigation of several Solid Waste Management Units (SWMUs) relative to currently inactive or removed septic systems across Holloman Air Force Base (HAFB) is required.” The Permittee is advised that the inactive or removed septic systems will not be officially considered SWMUs until after characterization and assessment of potential releases to the environment has been accomplished through the proposed Work Plan. Until that time, the septic systems are to be considered “sites”. Once it has been determined that a release to the environment has occurred that will require either additional investigation or immediate corrective action, the Permittee shall comply with the facility’s RCRA Permit Part 4, Sections IV.B.1 and IV.B.2 regarding notification requirements for newly identified SWMUs.

The Permittee must revise this sentence to read: “Additional investigation of several inactive or removed septic systems located across Holloman Air Force Base (HAFB) is required to determine if they are to be considered Solid Waste Management Units (SWMUs) requiring further investigation or corrective action as required by HAFB’s RCRA Permit, Part 4, Corrective Action”.

3. **Page 3-2, Section 3.1, 4th Bulleted Item; Page 3-3, Section 3.1, 5th Bulleted Item; and Page 3-6, Section 3.2.3, 1st Paragraph, 2nd Sentence**

The Permittee shall revise these items and the aforementioned sentence to indicate that the “Technical Memorandum” shall be submitted to the NMED for concurrence, to assist in determining placement of each site into the proper category, and to determine which constituents of concern will be analyzed for at each site.

4. **Page 3-3, Section 3.1, 1st Bulleted Item**

The Permittee shall revise this item to indicate that the results of these investigations shall be submitted to the NMED for a determination as to which category the systems should be placed in.

5. **Page 3-5, Section 3.2.2; Page 3-7, Section 3.2.4.1; and Page 3-8, Section 3.2.4.2**

The Permittee shall add the following to the lists of potential analytes and analytical methods: Polychlorinated biphenyls (PCBs) by EPA Method 8082 and Total cyanide by EPA Method 9010A.

6. **Page 3-6, Section 3.2.3, 7th Bulleted Item, 2nd Sentence**

The Permittee shall revise this sentence to state that the figures will include an indication of the datum projection that was used (e.g., New Mexico State Plane Coordinate System, Central Zone, 1983 [ft]).

7. **Page 3-7, Section 3.2.4.1, 1st Paragraph, 2nd Sentence and Page 3-8, Section 3.2.4.2, 1st Paragraph, 2nd Sentence**

The Permittee shall revise the acronym "HAS" in these two sentences to read "HSA".

8. **Page 3-7, Section 3.2.4.1**

The Permittee shall revise this section to indicate that if the septic system is found to be a seepage pit or a septic tank without intact sidewalls or bottom, a soil boring shall be advanced through the center of the pit/tank, in addition to proposed soil borings within any leachfield. Two soil samples shall be collected as proposed in the Work Plan.

9. **Page 3-9, Section 3.2.6, 2nd Paragraph**

This paragraph states that a risk-based approach will be used to evaluate results from the sampling activities. The Permittee shall provide a detailed description of the procedures to be followed for any risk assessment to be performed.

10. **Page 3-10, Section 3.2.6, 2nd Paragraph, 1st Sentence**

This sentence states that a TPH screening level of 940 mg/kg will be used to evaluate the laboratory analytical data, which is the action level for soil contaminated with kerosene or jet fuel. The Permittee shall revise this sentence to state that a TPH screening level of 800 mg/kg will be used, which is for unknown oil.

11. **Page 3-12, Section 3.3.2.1.2, 1st Paragraph**

The Permittee shall revise this paragraph to indicate that if the septic system is found to be a seepage pit or a septic tank without intact sidewalls or bottom, a temporary monitoring well shall be installed through the center of the pit/tank, in addition to the proposed monitoring wells to be installed within any leachfield area. The well shall be installed and sampled as proposed in the Work Plan.

12. **Page 3-13, Section 3.3.2.1.3, 4th Sentence and Appendix B, SOP-8, Page 2, Section 3.0, Item C**

This sentence and item state that a peristaltic pump will be used to collect groundwater samples. NMED notes that volatile organic compounds (VOCs) are part of the suite of contaminants to be analyzed for. The Permittee is advised that the use of a peristaltic pump to collect VOC samples is not permitted as degassing of the VOCs could occur. Therefore, the Permittee shall propose an alternate method of sampling groundwater (e.g., bailing or low flow submersible pump).

13. **Page 4-1, Section 4.1, 3rd Paragraph, 2nd Sentence**

The Permittee shall revise this sentence to state that the Site Specific Addendum to the Basewide Quality Assurance Project Plan shall be submitted to the NMED for approval. In particular, the NMED will be reviewing the sensitivity limits (e.g., IDLs, MDLs, RLs), data validation procedures and data reporting procedures.

14. **Page 4-7, Section 4.5**

The Permittee shall revise this section to state that the organizational chart and work schedule shall be submitted to the NMED for review.

15. **Table 3-2**

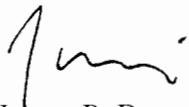
The Permittee shall revise this table to show maximum sample holding times for the various analytes, as per SOP-5 and SOP-8 in Appendix B.

Please submit the required information in the form of a revised Work Plan that incorporates all the responses to the above comments 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 by October 5, 2009.

Mr. David Scruggs
July 31, 2009
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If you have any questions regarding this Notice 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

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-09-003