HAFB

NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.nmenv.state.nm.us

BILL RICHARDSON
Governor

DIANE DENISH
Lieutenant Governor

RON CURRY
Secretary

JON GOLDSTEIN
Deputy Secretary

ENTERED

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 10, 2009

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

SUBJECT: NOTICE OF DISAPPROVAL: SS-17 BX GAS STATION FUEL LEAK SITE, ACCELERATED CORRECTIVE MEASURES WORK PLAN, MARCH 2009
HOLLOMAN AIR FORCE BASE, NM6572124422
HAFB-09-006

Dear Mr. Scruggs:

The New Mexico Environment Department (NMED) has reviewed the above referenced document, which was submitted for the performance of additional characterization and remediation activities at the off-site area that is contiguous to the BX Gas Station site by Holloman Air Force Base (the Permittee). The Work Plan cannot be approved at this time, as revisions are necessary. The Permittee must address the following deficiencies before the NMED can make a final determination regarding approval.

GENERAL COMMENTS

1. The Permittee must submit a Site Specific Addendum to the Basewide Quality Assurance Project Plan (QAPP) for soil and ground water sampling activities associated with the proposed off-site characterization. This QAPP must include, at a minimum, information on: project laboratories, data categories (i.e., screening and definitive), data quality assurance and quality control (e.g., reporting limits, practical

quantitation limits), laboratory quality control checks (e.g., method blanks, duplicates, matrix-spiked samples), and sample handling procedures.

2. The Permittee must revise Figures 1-2, 1-3, 2-1, 3-2, 3-3, 3-4, 4-1, 4-2, 4-3 and 4-5 to show New Mexico State Plane Coordinates.

SPECIFIC COMMENTS

3. **Page 3-1, Section 3.2**

The Permittee must revise this section to include evaluation of inorganic constituents detected in soil and ground water above the reporting limit against the soon-to-be established base-wide background concentrations. According to the NMED Soil Screening Guidance (August, 2009), the maximum detected concentration for each contaminant that is detected above the reporting limit must be used. In the event that the maximum detected concentration exceeds the background reference datum, a statistical comparison of the data populations may be conducted.

Under past investigations, concentrations detected in soil were compared to the 2006 NMED soil screening levels (SSLs). Please note that NMED has revised the SSLs and for all future evaluations, the 2009 SSLs, or subsequent revisions, must be applied. In the event that a constituent is not included in the NMED SSL tables, data from the Environmental Protection Agency (EPA) Region 6 Regional Screening Level tables may be applied.

4. **Page 3-1, Section 3.2, 1st Sentence**

The Permittee must delete the reference to "Section III.1.2" of the HAFB Hazardous Waste Permit. This section refers to ground water perchlorate cleanup levels. All of Appendix 4-F of the Permit is to be used as potential regulatory criteria for analytical data evaluation.

5. **Page 3-5, Section 3.3.4, 1st Full Paragraph, 1st Sentence**

The Permittee must revise this sentence to state that the potentiometric surface map is Figure 2-1, not Figure 3-5.

6. **Page 4-3, Section 4.3, 2nd Paragraph and Table 4-3**

The Permittee must revise this paragraph and table to state that, in addition to volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), total petroleum hydrocarbons (TPH) and target analyte list (TAL) metals will be added to the list of analytes for all soil samples.

7. **Page 4-3, Section 4.3, 2nd Paragraph, 5th Sentence**

The Permittee must revise this sentence to state that a minimum of two soil samples for laboratory analysis of VOCs, SVOCs, TPH and TAL Metals shall be collected from each location based on field screening results.

8. **Page 4-4, Section 4.4 and Table 4-3**

This section discusses ground water sampling procedures but does not indicate which constituents will be analyzed for. The Permittee must revise this section and table to show that VOCs, SVOCs, TPH, TAL metals and total dissolved solids (TDS) will be analyzed for.

9. **Page 4-4, Section 4.4, 2nd Paragraph, 1st Sentence and Appendix B, SOP-8, Page B-22, Section 3.0, 3rd Bulleted Item**

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 analytes to be sampled for. The Permittee is advised that the use of a peristaltic pump to collect VOC samples is not permitted as volatilization of the VOCs could occur. Therefore, the Permittee must propose an alternate method of sampling groundwater (e.g., bailing or low flow submersible pump).

10. **Page 4-5, Section 4.5**

This section discusses the use of Bio-Trap samplers to conduct the in situ microcosm study. The Permittee must submit manufacturer's literature about the functionality and effectiveness of the Bio-Trap samplers, including schematics.

11. **Page 4-13, Section 4.6.6**

This section indicates that the results of the activities proposed in the work plan will be presented in an Accelerated Corrective Measures (ACM) Completion Report. The Permittee is advised that one final ACM Completion Report must be submitted after all corrective action work that is being conducted at site SS-17, both on-site and off-site, is complete. Therefore, the Permittee must revise this section to indicate that an organizational chart and a work schedule will be submitted to the NMED for review. The Permittee must propose the submittal of, at a minimum, semi-annual progress reports for the proposed accelerated corrective measures to the NMED for review. These progress reports shall contain, at a minimum, the following information:

a. A description of the portion of the corrective measures completed during the reporting period;

b. Summaries of findings;
c. Summaries of any deviations from the approved work plan during the reporting period;
d. Summaries of any problems or potential problems encountered during the reporting period; and
e. Projected work for the next reporting period.

12. **Page 5-1, Section 5.0, 7th Item; Tables 3-2 and 3-4, Last Footnote; and Figures 3-3 and 4-1, Legend**

The Permittee must revise this item and the footnotes and legends to indicate that soil data will be compared to the recently revised NMED Soil Screening Levels, Version 5.0, August 2009.

13. **Table 3-1 and Figures 3-3 and 4-1**

The results for sample SS17-SB03-5 shown on Table 3-1 do not match the results for sample SB03 shown on Figures 3-3 and 4-1. In addition, the depth of this sample is shown as 5 feet on Table 3-1 and as 7 feet on Tables 3-3 and 4-1. The Permittee must correct these discrepancies.

14. **Table 3-6, 1st Column**

The Permittee must revise this table so that the Specimen ID numbers match the soil boring numbers presented on the figures or provide another figure showing the locations of the specimens.

Please submit the required information in the form of a revised Work Plan that incorporates all the responses to this NOD, indicating added information in highlights, and deleted information in strikeouts, and on CDs compatible with Microsoft Word. In order to expedite review of the responses, provide a matrix of the comments and HAFB responses. This response must be provided by November 10, 2009.

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-09-006