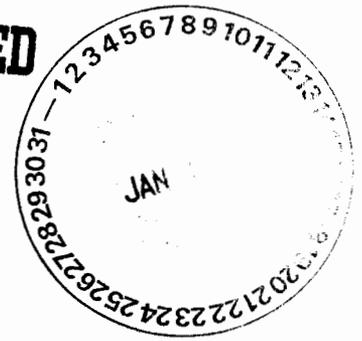




DEPARTMENT OF THE AIR FORCE **ENTERED**
HEADQUARTERS 49TH FIGHTER WING (ACU)
HOLLOMAN AIR FORCE BASE, NEW MEXICO

11110



A. David Budak
Deputy Base Civil Engineer
550 Tabosa Avenue
Holloman AFB NM 88330-5840

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

Dear New Mexico Environment Department

Holloman AFB is pleased to submit the SS-17 BX Gas Station Fuel Leak Accelerated Corrective Measures (ACM) Work Plan Response to Comments for your review.

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.

If you have any questions, please contact Mr. David Scruggs of our Asset Management Flight at (575) 572-5395.

Sincerely

A. DAVID BUDAK, YF-3, DAFC

Attachment:
SS-17 ACM Response to Comments

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 Comments
SS-17 BX Gas Station Fuel Leak Site, Accelerated Corrective Measures Work Plan
Holloman Air Force Base, New Mexico
November 2009
Nation View Project Number 8090029

Comment No.	Section	Page	Comment	Response
Author: NMED			Date of Comments: September 10, 2009	Date of Response: June 3, 2009
1	General		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.	Response: The Permittee concurs, the appropriate site specific QAPP information will be added to the
2	General		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.	Response: The Permittee concurs, the coordinates will be added to the Figures.
3	Section 3.2	Page 3-1	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	Response: The Permittee concurs, the requested analysis and table will added.

Response to Comments
SS-17 BX Gas Station Fuel Leak Site, Accelerated Corrective Measures Work Plan
Holloman Air Force Base, New Mexico
November 2009
Nation View Project Number 8090029

Comment No.	Section	Page	Comment	Response
			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	Section 3.2	Page 3-1	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.	Response: The Permittee concurs. The referenced text will be deleted. Further, This site is a gasoline release. There are no documented activities at the site related perchlorate.
5	Section 3.3.4 1 st sentence	Page 3-5	The Permittee must revise this sentence to state that the potentiometric surface map is Figure 2-1, not Figure 3-5.	Response: The Permittee concurs. The text will be changed to indicate that Figure 2-1 is the potentiometric map.
6	Section 4.3 2 nd paragraph and Table 4-3	Page 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.	Response: The permittee disagrees. During this phase of the ACM, the principal objective is the delineation and remediation of hydrocarbons. Therefore, at this phase, only TPH and BTEX (including chlorobenzenes) will be used to characterize the type and mass of hydrocarbons for treatment. To use available funds to characterize which may change due to the proposed treatment is not meaningful. However, some metals indicative of treatment activities such as iron and manganese will be analyzed for

Response to Comments
SS-17 BX Gas Station Fuel Leak Site, Accelerated Corrective Measures Work Plan
Holloman Air Force Base, New Mexico
November 2009
Nation View Project Number 8090029

Comment No.	Section	Page	Comment	Response
				<p>treatment efficacy. However, final confirmation samples used to document the completion of treatment will used to include TPHs, VOCs, SVOCs, TAL metals, anions (such sulfate, nitrates, and chloride) as necessary to compare both background and regulatory action levels.</p>
7	Section 4.3, 2 nd paragraph 5th sentence	Page 4-3	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.	Response: The permittee disagrees. See response to comment #6
8	Section 4.4 Table 4-3	Page 4-4	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.	<p>Response: Response: The permittee disagrees. During this phase of the ACM, the principal objective is the delineation and remediation of hydrocarbons. Therefore, at this phase, only TPH and BTEX (including methyl-benzenes) will be used to characterize the type and mass of hydrocarbons for treatment. To use available funds to characterize which may change due to the proposed treatment is not meaningful. However, some metals indicative of treatment activities such as iron and manganese will be analyzed for treatment efficacy.</p> <p>However, final confirmation samples used to document the completion of treatment will used to include TPHs, VOCs, SVOCs, TAL metals, anions (such sulfate, nitrates, and</p>

Response to Comments
SS-17 BX Gas Station Fuel Leak Site, Accelerated Corrective Measures Work Plan
Holloman Air Force Base, New Mexico
November 2009
Nation View Project Number 8090029

Comment No.	Section	Page	Comment	Response
				chloride) as necessary to compare both background and regulatory action levels.
9	Section 4.4 2 nd paragraph 1 st sentence and Appendix B, SOP-8, Page B-22, Section 3.0, 3 rd bullet	Page 4-4	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).	Response: The Permittee concurs. The text will be changed to indicate that either a bailer or low flow pump that does not does not have the potential to introduce air into the sample will be used. Additionally, similar changes will be incorporated into the appropriate SOPs.
10	Section 4.5	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.	Response: The Permittee concurs. The text will be changed to include more specifics regarding the Bio-Trap samplers. This will consist of information provided by the vendor including drawings or schematics and instructions will be included in the Appendices.
11	Section 4.6.6	Page 4-11	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	Response: The Permittee concurs. This section will be expanded to include semi-annual progress reports. These reports will include documentation of progress with the in-situ approach, any problems encountered, modifications, injections volumes, monitoring results, and the items listed (items a through e.) in the comment.

Response to Comments
SS-17 BX Gas Station Fuel Leak Site, Accelerated Corrective Measures Work Plan
Holloman Air Force Base, New Mexico
November 2009
Nation View Project Number 8090029

Comment No.	Section	Page	Comment	Response
			<p>proposed accelerated corrective measures to the NMED for review. These progress reports shall contain, at a minimum, the following information:</p> <ul style="list-style-type: none"> 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	Section 5.0 7 th Item; tables 3-2 and 3-4, Last Footnote; and Figures 3-3 and 4-1, Legend	5-1	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.	Response: The Permittee concurs. The text will be changed to indicate that the latest revised NMED Soil Screening Levels, Version 5.0, August 2009 will be used.
13	Table 3-1 Figures 3-3 and 4-1	x	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.	Response: The Permittee believes the comment is referring to Table 3-1 and Figures 3-3 and 4-1. However, these items appear consistent with the 7 foot depth interval of SB03 as the maximum concentration on the table and figures.

Response to Comments
SS-17 BX Gas Station Fuel Leak Site, Accelerated Corrective Measures Work Plan
Holloman Air Force Base, New Mexico
November 2009
Nation View Project Number 8090029

Comment No.	Section	Page	Comment	Response
14	Table 3-6, 1 st Column	x	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.	Response: The Permittee concurs. The tables will be changed as necessary.