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RON CURRY  
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Deputy Secretary

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

March 26, 2010

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

**RE: NOTICE OF APPROVAL WITH MODIFICATIONS  
RESPONSE TO THE NOTICE OF DISAPPROVAL FOR THE RCRA FACILITY  
INVESTIGATION WORK PLAN, SWMU 183 – BASEWIDE SEWER SYSTEM  
HOLLOMAN AIR FORCE BASE, NEW MEXICO, AUGUST 2009  
EPA ID# NM6572124422  
HWB-HAFB-08-003**

Dear Mr. Scruggs:

The New Mexico Environment Department (NMED) has reviewed Holloman Air Force Base's (the Permittee's) September 14, 2009, response to the NMED's May 14, 2009, Notice of Disapproval (NOD) for the subject Work Plan, which was submitted for the investigation of potential hazardous waste releases at Solid Waste Management Unit (SWMU) 183 - Basewide Sewer System. NMED approves the subject Work Plan subject to the following modifications.

**1. Soil/Groundwater Screening Levels**

It is not clear whether results from soil sampling will be compared to the soil-to-groundwater screening levels to assess whether concentrations of hazardous constituents are of such a magnitude that they could migrate to groundwater and cause contamination. While some areas of HAFB have total dissolved solids (TDS) concentrations in groundwater that exceed 10,000 milligrams per liter (mg/L), this evaluation of screening

levels may be useful in identifying soil that may be a source for groundwater contamination, and thus, may require remedial action.  
The Permittee shall discuss the comparison of site data to soil-to-groundwater screening levels in the Investigation Report.

2. **Notice of Deficiency Letter from NMED to the Permittee, dated May 14, 2009, Comment #42, 1<sup>st</sup> sentence after bullet points; Permittee's Response to the May 14, 2009, NOD Letter, Comment/Response Matrix, Comment #42; Section 6.4.2, pages 6-20 and 6-21, all; and Table 4-2 of Appendix A; Section 1, page 1-1, 3<sup>rd</sup> paragraph, 1<sup>st</sup> and 2<sup>nd</sup> sentences;**

The Permittee must acquire the requested data at a sufficiently low level of detection to definitively characterize each compound to meet Resource Conservation and Recovery Act (RCRA) requirements.

In the NOD of May 14, 2009, the issue of the chosen laboratory's high MDL was addressed by the NMED, as illustrated by the following excerpt:

- **Notice of Deficiency Letter from NMED to the Permittee, dated May 14, 2009, Comment #42, 1<sup>st</sup> sentence after bullet points:** "The Permittee must obtain new, lower reporting limits from the laboratory or contract with a laboratory that can provide lower reporting limits."

However, the Permittee declined to provide lower reporting limits as indicated in the following excerpts:

- **Permittee's Response to the May 14, 2009, NOD Letter, Comment/Response Matrix, Comment #42:** "Do not concur. Benzo(a)pyrene and pentachlorophenol have not been identified as contaminants of potential concern and have not been historically detected at oil/water separators associated with SWMU 183, therefore separate analysis for these constituents will not be conducted."
- **Section 6.4.2, pages 6-20 and 6-21, last paragraph on page 6-20 and continuing on page 6-21:** "As noted previously, for several compounds, MDLs [method detection limits] will be used to meet the respective ARARs [Applicable or Relevant and Appropriate Requirements]. Where concentrations fall between the PQLs [practical quantitation limits] and the MDLs, the data will be qualified accordingly. Exceptions to meeting the ARARs include benzo(a)pyrene and pentachlorophenol which have federal MCLs of 0.2 ug/L and 1.0 ug/L, respectively. TAL-DENs [TestAmerica Laboratories in Denver, Colorado] MDLs for these compounds are 0.74 ug/L and 20 ug/L, respectively. Although the ARAR values for these analytes may prove to be non-applicable to the DQOs [data quality objectives] for this project because these two compounds are not COPCs [contaminants of potential concern] that have been detected with the industrial discharges and OWSs [oil water separators] associated with SMWU 183."

- **Section 6.4.2, page 6-20, 3<sup>rd</sup> paragraph, 2<sup>nd</sup> bullet point:** “MDL studies for the analytical methods specified in Table 4-2 of QAPP Addendum (Appendix A).”
- **Table 4-2 of Appendix A:** The table lists chemical parameters; Chemical Abstract (CAS) numbers; reporting limits; evaluation criteria; and the lower and upper control limits for laboratory control samples, matrix spikes, and matrix spike duplicates.

Table 1, below, is modified from Table 4-2 of Appendix A and shows that a total of nine chemical parameters have reporting limits greater than the most conservative screening level for either groundwater or soil.

**Table 1**  
**Summary of laboratory reporting limits and evaluation criteria modified from**  
**Table 4-2 of Appendix A**

Parameter	Chemical Abstracts Number	WATER			SOIL	
		Laboratory Reporting Limit ug/L	NMWQCC Human Health Standard <sup>1</sup> ug/L	USEPA MCL <sup>2</sup> ug/L	Laboratory Reporting Limit mg/kg	NMED SSL <sup>3</sup> mg/kg
1,2-Dibromoethane (EDB)	106-93-4	1	0.1	0.05	0.005	0.547
1,2-Dibromo-3-chloropropane (DBCP)	96-12-8	2	NV	0.2	0.005	0.194
Benzo(a)pyrene	50-32-8	5	0.7	0.2	0.17	0.481
Hexachlorobenzene	118-74-1	5	NV	1	0.17	2.45
N-nitroso-di-n-propylamine	621-64-7	5	NV	NV	0.17	0.069 <sup>4</sup>
Pentachlorophenol	87-86-5	25	NV	1	0.83	20.7
Antimony	7440-36-0	10	NV	6	1.5	31.3
Arsenic	7440-38-2	15	100	10	2	3.59
Thallium	7440-28-0	15	NV	2	1.20	5.16

**Abbreviations**

**Bold** = Laboratory reporting limit is greater than evaluation criteria  
 MCL = maximum contaminant level  
 mg/kg = milligrams(s) per kilogram  
 NV = No value listed  
 NMED = New Mexico Environment Department

NMWQCC = New Mexico Water Quality Control Commission  
 SSL = soil screening level  
 ug/L = microgram(s) per liter  
 USEPA = U.S. Environmental Protection Agency

**Footnotes**

- <sup>1</sup> NMWQCC Human Health Standards for groundwater of 10,000 mg/L total dissolved solids concentration or less: New Mexico Administrative Code 20.6.2.3103.  
<sup>2</sup> U.S. Environmental Protection Agency MCLs: National Primary Drinking Water Regulations, May 2009, EPA 816-F-09-0004.  
<sup>3</sup> NMED SSLs: *Technical Background Document for Development of Soil Screening Levels*, Revision 5.0, August 2009, Residential Soil.  
<sup>4</sup> Value is a USEPA Regional Screening Level: “Regional Screening Levels for Chemical Contaminants at Superfund Sites,” [http://www.epa.gov/reg3hwmd/risk/human/rb-concentration\\_table/index.htm](http://www.epa.gov/reg3hwmd/risk/human/rb-concentration_table/index.htm), 2009.

Additionally, the Permittee states in the Work Plan introduction that the purpose of the investigation is to identify and characterize potential releases, as illustrated below:

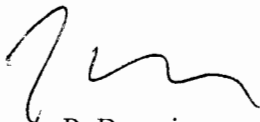
- **Section 1, page 1-1, 3<sup>rd</sup> paragraph, 1<sup>st</sup> and 2<sup>nd</sup> sentences:** “The purpose of the SWMU 183 RFI [RCRA Facility Investigation] is to collect data

necessary to identify and characterize potential releases from the HAFB sewer system and to assess their associated risks, if any. If any releases are identified during the RFI, a risk assessment (described in Section 7 of this Work Plan) will use the RFI analytical data to determine if these subsurface releases pose and unacceptable risk to human health and/or the environment.”

In the absence of possessing analytical data from SWMU 183, the Permittee is unable to definitively state in advance of completing the investigation that any compound should be ruled out as a potential contaminant at the SWMU. Therefore, the Permittee must obtain lower reporting limits from TAL-DEN or contract with a laboratory that can provide lower reporting limits to provide definitive data regarding the presence or absence of the analytes identified in Table 4-2 of Appendix A of the Work Plan.

The Permittees must complete the work specified in the subject Work Plan in accordance with the Work Plan schedule, as specified in Section 10 of the Work Plan. If you have any questions regarding this matter, please contact Dezbah Tso of my staff at (505) 222-9528, or at the above letterhead address.

Sincerely,



James P. Bearzi  
Chief  
Hazardous Waste Bureau

BRZ:dt

cc: J. Kieling, NMED HWB  
W. Moats, NMED HWB  
D. Strasser, NMED HWB  
D. Tso, NMED HWB  
L. King, EPA, Region 6 (6PD-F)  
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