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DAVE MARTIN  
Secretary

BUTCH TONGATE  
Acting Deputy Secretary

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

August 29, 2011

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

David Scruggs  
Chief, Asset Management Flight  
49 CES/CEVR  
550 Tabosa Avenue  
Holloman AFB, NM 88330-8458

**RE: NOTICE OF DEFICIENCY  
EXPANDED CLOSURE AND POST-CLOSURE CARE PLANS  
20,000 POUND OPEN DETONATION UNIT  
HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422  
HWB-HAFB-10-005-OD**

Dear Messrs. Budak and Scruggs:

The New Mexico Environment Department (NMED, the Department) has received the Holloman Air Force Base's (HAFB's, the Permittee's) *Expanded Closure and Post-Closure Care Plans for the 20,000 Pound Open Detonation (OD) Unit* (Expanded Plan) dated July 20, 2011. NMED has reviewed the Expanded Plan and hereby issues this Notice of Deficiency (NOD) with the following comments:

**Comment 1**

The Closure Plan does not address the nitroglycerin and RDX contaminated soils other than providing figures showing the location of associated sample locations (see Appendix A, Figures 1 and 2). Please provide more detailed information on the RDX contaminated soils at the OD Unit. Incorporate the additional information into the revised version of the Expanded Closure Plan that shall be submitted to the NMED.

**Comment 2**

The Permittee proposes to submit to NMED a Corrective Action Work Plan at Section 2.8 (page 2-8) should any soil samples be found to exceed SSLs and apparently HAFB is planning on submitting one.

NMED recommends that the Revised Expanded Closure Plan be augmented to address the two locations of known nitroglycerine and the single RDX contaminations now (see Figures 1 and 2). A Corrective Action Work Plan may be submitted only if additional contamination above action levels is identified at the OD Unit at locations other than those three shown on Figures 1 and 2.

**Comment 3**

The Expanded Closure Plan does not address performing an ecological risk assessment unless residential screening levels are exceeded (see Closure Plan page 2-7). Further, Permit Module III, Section 3 describes generating ecological screening action levels and an ecological risk assessment but this was never done.

The Permittee must provide an ecological risk assessment and incorporate it into the revised Expanded Closure Plan. Include also a Human Health Risk assessment in the revised Expanded Closure Plan.

**Comment 4**

In Appendix A, Section 2.2.3.2 HAFB states that groundwater samples will be collected at the four existing monitoring wells for the appropriate set of analytes listed in Table 3 of Appendix A, but the Permittee does not specify when the groundwater sampling will commence.

Provide information about when HAFB plans to begin groundwater sampling at the four existing wells at the OD Unit, and for how long the Permittee plans to conduct the groundwater sampling.

Further, the Permittee shall augment the Closure Plan so that if clean closure of the OD Unit is achieved the monitoring wells shall be appropriately plugged and abandoned. Describe how the Permittee will conduct plugging and abandonment of the groundwater sampling wells following clean closure activities at the OD Unit.

**Comment 5**

Please remove all "Permit Text" excerpts from the revised Closure Plan, except in cases like Section 2.1 (Closure Performance Standard), where it may be retained, but no longer titled "Permit Text" in any section of the Closure Plan.

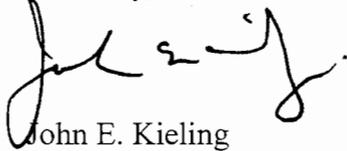
Messrs. Budak and Scruggs  
August 29, 2011  
Page 3

If the Permittee determines that clean closure of the OD Unit cannot be achieved then that information must be included in the Closure Report that will be submitted to NMED at the conclusion of all closure activities.

The Permittee must address all comments contained in this NOD and submit a revised Amended Plan no later than October 31, 2011. The revised Amended Plan must include a response letter that details where all revisions have been made, cross-referencing NMED's numbered comments. In addition, an electronic version of the revised Amended Plan must be submitted that identifies where all changes have been made in red-line strikeout format.

If you have any questions regarding this NOD please contact Cornelius Amindyas of my staff at (505) 222-9543 or at the above letterhead address.

Sincerely,



John E. Kieling  
Acting Chief  
Hazardous Waste Bureau

cc: W. Moats, NMED HWB  
C. Amindyas, NMED HWB  
D. Strasser, NMED HWB  
S. Pullen, NMED HWB  
L. King, EPA-Region 6 (6PD-N)  
File: HAFB 2011 and Reading