DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 49TH WING (ACC)
HOLLOMAN AIR FORCE BASE, NEW MEXICO

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NMED Hazardous Waste Bureau

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

New Mexico Environment Department
Attn: Mr. John Kieling
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe NM 87105-6303

Dear New Mexico Environment Department

Holloman Air Force Base is pleased to submit the response to comments to your October 31 Notice of Disapproval Class 3 Permit Modification Request for Ten Solid Waste Management Units (SWMUs). Attached you will find our responses to comments and the corrected Statement of Basis.

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

2011 12 14

A. DAVID BUDAK, GS-14, DAFC

2 Attachments:
1. Response to Comments
2. Statement of Basis for Ten SWMUs

cc:

(w/ Atch)	(w/o Atch)	(w/o Atch)
Mr. David Strasser	Mr. Will Moats	Ms. Laurie King
Hazardous Waste Bureau	Hazardous Waste Bureau	USEPA, Region 6 (6PD-F)
5500 San Antonio Dr. NE	5500 San Antonio Dr. NE	1445 Ross Ave., Ste 1200
Albuquerque NM 87109	Albuquerque NM 87109	Dallas TX 75202

7011 0470 0000 2285 9488

RESPONSE TO COMMENTS

STATEMENT OF BASIS
FOR APPROVAL OF
NO FURTHER ACTION FOR TEN SOLID WASTE MANAGEMENT UNITS

March 2007

RCRA CORRECTIVE ACTION PROGRAM

HOLLOMAN AFB, NEW MEXICO

The following table contains the comments provided by the New Mexico Environment Department (NMED) in the October 31, 2011 Notice of Deficiency and the response by Holloman Air Force Base to each comment.

	NMED Comment:	Comment Response:
1.	**General Comment:** The Permittee shall submit revised Tables A and B of Appendix 4-A of Permit Part 4 showing the redline-strikeout and clean versions of the proposed changes to the Tables. The revised Table A must show the addition of AOC-838 (SS-72) and AOC-1088 (SS-73) as new sites.	Tables A and B have been provided in both the clean and redline strikeout versions.
2.	**Page 5, Section C, 1st Paragraph, 3rd Sentence:** The Permittee shall revise this sentence to indicate that the Permit was renewed on February 24, 2004	The Figure has been revised to reflect the change requested in the comment.
3.	**Figure 2.** The Permittee shall revise this Figure to show the correct location of AOC-S at the corner of 1st Street and Arnold Ave.	The Figure has been revised to reflect the change requested in the comment.
4.	**Page 9, Sections G and H, Public Participation and Further Steps.** The Permittee shall revise these Sections to provide a discussion about the Public Meeting that the Permittee held on June 6, 2008 and to provide its results (i.e. that no public comments or public hearing request were received	The Figure has been revised to reflect the change requested in the comment.
5.	**Page 23, Section J3, ERP Site FT-31.** The Permittee shall provide the status of the Discharge Permit(s) issued by the NMED, Ground Water Quality Bureau for the Hydrocarbon Land Farm, including the permit number(s), termination date, and reasons for termination	The Figure has been revised to reflect the change requested in the comment. Information regarding the status and permit number have been included.

APPENDIX 4-A

SUMMARY OF SOILID WASTE MANAGEMENT UNITS

TABLE A

The following is the Prioritized list of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) Requiring Corrective Action

SERIAL NO.	SWMU	ERP SITE ID	UNIT NAME
1	4	SD-08	Building 131 Oil/Water Separator
2	8	N/A	Building 231 Oil/Water Separator
3	19	SS-59	Building 638 Oil/Water Separator
4	20	SS-59	Building 639 Oil/Water Separator
6	82	N/A	Building 131 Washrack
7	101	LF-10	Building 121 Landfill
8	104	LF-29	Former Army Landfill
9	105	LF-19	Golf Course Landfill
11	108	LF-23	MOBSS Landfill Disposal Trench
12	109	LF-10	Old Main Base Landfill
13	111	RW-42	Radioactive Waste Disposal Area
14	113A	OT-20	Sludge Disposal Trench near Lagoons
15	113B	DP-30/SD-33	Sludge Disposal Trenches Fire Training Area
16	114	OT-03	TEL Disposal Site
17	115	LF-22	Waste Area Landfill #1 PCB Disposal Area
18	116	LF-21	West Area Landfill #2
19	118	OT-16	Building 21 Pesticides Holding Tank
20	122	N/A	Building 702 Waste Oil Tank
21	123	N/A	Building 704 Waste Oil Tank
23	130	SS-46	Taxiway 4 Tank 28 JP-4 Underground Waste Tank
24	132	OT-16	Building 21 Entomology Leachfield
26	136	N/A	Building 1119 Washrack Drainage Area
27	137	OT-38	Building 1166 Test Track Drain Field
28	139	OT-37	Lake Holloman
29	140	N/A	Lake Stinky
30	141	SD-27	Pad 9 Drainage Pit
31	165	SS-39	Building 1176 Pond
32	166	SD-25	MOBSS Drainage Lagoon
34	177	SS-39	Building 1176 Sumps
35	179	SS-39	Discharge Box
36	181	SS-39	Building 1176 Drainage Trough
37	183	N/A	Air Base Sewer System
38	197	OT-14	Former Entomology Shop

SERIAL NO.	SWMU/AOC	ERP SITE ID	UNIT NAME
39	229	SS-59	Test Cell Fuel Spill Site
40	AOC-1	DP-64	Chemical Agent Site
42	AOC-3	DP-63	Ammunition Yard Disposal Pit
43	AOC-4	N/A	West POL Fuel Spill Site
44	AOC-1001	SS-61	Building 1001 Fuel Spill Site
45	AOC-FST837	N/A	Building 837 Fuel Spill Site
46	AOC-A	OT-16	Building 21 Pesticide Rinsewater Spill Area
47	AOC-B	SS-65	Building 807 Test Cell Surface Spill Area
48	AOC-C	SS-66	Building 835 Spills
49	AOC-E	SS-67	Buildings 903-909 Sand Blast Residues
51	AOC-H	SS-18	Chromic Acid Spill Area
52	AOC-I	SS-69	Fighter Wing Flight Line Spill
53	AOC-J	SS-13	Herbicide Sodium Arsenite Spill Area
54	AOC-K	SS-12	Northeast Fuel Line Spill #1
55	AOC-L	OT-37	Early Missile Test Site
56	AOC-M	RW-70	Building 18
57	AOC-N	SS-48	Building 137 Military Gas Tank Leak
58	AOC-O	OT-45	Building 296 Old AGE Refueling Station
59	AOC-P	OT-44	Building 301 Fuel Tank Leak
60	AOC-Q	SS-17	BX Gas Station Fuel Line Leaks
62	AOC-RD	DP-62	Rita's Draw Disposal Pit
64	AOC-T	SS-05	POL Storage Tank Spill Sites 1 & 2
65	AOC-U	N/A	Lost River Basin
69	PRI-A	OT-35	Primate Research Lab Sewer Line
70	AOC-838	SS-72	TCE in Groundwater up-gradient of LF-21
71	AOC 1088	SS-73	TEC in Groundwater up-gradient of SS61

TOTAL OF CORRECTIVE ACTION SITES = 59 [i.e., 35 SWMUs + 24 AOCs].

STATEMENT OF BASIS FOR APPROVAL OF NO FURTHER ACTION FOR TEN SOLID WASTE MANAGEMENT UNITS

RCRA CORRECTIVE ACTION PROGRAM

HOLLOMAN AFB, NEW MEXICO

Prepared By:

49 CES/CEV
Environmental Flight
550 Tabosa Avenue
Holloman Air Force Base
New Mexico

December 2007

STATEMENT OF BASIS FOR APPROVAL OF NO FURTHER ACTION FOR TEN SOLID WASTE MANAGEMENT UNITS

RCRA CORRECTIVE ACTION PROGRAM

HOLLOMAN AFB, NEW MEXICO

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ACRONYMS AND ABBREVIATIONS

AAF	Army Air Field
AFB	Air Force Base
amsl	Above mean sea level
AOC	Area of Concern
AS	Air Sparging
AST	Aboveground storage tank
ASTM	American Society foresting Materials
bgs	Below ground surface
Bhate	Bhate Environmental Associates, Inc.
BTEX	Benzene, toluene, ethyl benzene, xylenes
BHUST	Base Hospital Underground Storage Tank
CA	Corrective Action
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CES/CEV	Civil Engineering Squadron/Combat Engineer Vehicle
COPC	Chemicals of potential concern
CSM	Conceptual site model
cy	Cubic yards
DPT	Direct Push Technology
DRO	Diesel-Range Organics
EM	Exposure Model
ERP	Environmental Restoration Program
ESA	Ecological Screening Assessment
°F	Degrees Fahrenheit
ft	Feet or foot
FWENC	Foster-Wheeler Environmental Corporation
GRO	Gasoline-Range Organics
HAFB	Holloman Air Force Base
HHRA	Human Health Risk Assessment
HSWA	Hazardous and Solid Waste Amendments
HVAC	Heating, ventilation, and air conditioning
IRP	Installation Restoration Program
J&E	Johnson and Ettinger
JP-4	Jet Fuel (formula 4)
MCL	Maximum Contaminant Level
mg/kg	Milligrams per kilogram
mg/L	Milligram per liter
$\mu g/m^3$	Micrograms per cubic meter
µg/g	Micrograms per gram
µg/kg	Micrograms per kilogram
ND	Not detected