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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 12, 2012

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

**RE: NOTICE OF DISAPPROVAL
DECEMBER 14, 2011 RESPONSE TO THE NOTICE OF DISAPPROVAL FOR
THE CLASS 3 PERMIT MODIFICATION REQUEST AND FACT
SHEET/STATEMENT OF BASIS FOR APPROVAL OF NO FURTHER ACTION
FOR TEN SOLID WASTE MANAGEMENT UNITS AND AREAS OF
CONCERN, JULY 2008
HOLLOMAN AIR FORCE BASE, EPA ID# NM6572124422
HWB-HAFB-07-006**

Dear Mr. Budak:

The New Mexico Environment Department (NMED) has reviewed Holloman Air Force Base's (the Permittee's) December 14, 2011 response to NMED's October 31, 2011 Notice of Disapproval (NOD) for the Class 3 Permit Modification Request for Ten Solid Waste Management Units that was submitted on July 2, 2008. NMED has determined that the response does not adequately address the issues raised in the NOD. The following are the remaining deficiencies the Permittee is required to address before a draft permit can be proposed for public comment by NMED.

Tables A and B of Appendix 4-A of Permit Part 4 that were submitted in the response to the NOD in redline and clean versions require extensive revisions.

1. **Required Table A Revisions** (The Serial Numbers refer the original, pre-revision numbers.)

- a. Serial No. 1 (SWMU 4): Delete the reference to ERP Site ID “SD-08” and replace with “N/A” as Building 131 was moved from its former location at SD-08 to its current location near Building 195.
- b. Serial No. 6 (SWMU 82): Restore the reference to ERP site ID SD-08 as this is the correct ERP ID for SWMU 82 (Building 131 Washrack).
- c. Serial Nos. 10 (SWMU 106), 26 (SWMU 136), 28 (SWMU 139), 29 (SWMU 140), 32 (SWMU 166), 45 (AOC-FST837), and 62 (AOC-RD): Delete these Serial Numbers from Table A and move to Table B as being “NFAed in November 2005”. Please note that Serial No. 10 (SWMU 106) was deleted from Table A but not moved to Table B.
- d. Serial Nos. 9 (SWMU 105), 11 (SWMU 108), 17 (SWMU 115), 18 (SWMU 116), 23 (SWMU 130), 57 (AOC-N), and 59 (AOC-P): Delete these Serial Numbers from Table A and move to Table B as being “NFAed in January 2012”. These sites are the subject of another Class 3 Permit Modification Request (PMR) that is being reviewed concurrently with the subject PMR.
- e. Serial No. 69 (AOC-PRI-A): Delete this site from Table A as it already appears on Table B.
- f. Revise the order of the Serial Numbers after all changes have been made to re-establish the correct sequential order.
- g. Change the “Total of Corrective Action Sites” to read: 45 [i.e. 25 SWMUs + 20 AOCs.]

2. **Required Table B Revisions**

- a. Move the following SWMU/AOC numbers that are duplicated on pages 1, 2 and 3 of Table B to page 6 of Table B and arrange in the correct sequential order and indicate that they were NFAed in January 2012: No. 41 (AOC-2), No. 50 (AOC-F), No. 61 (AOC-R), No. 63 (AOC-S), No. 66 (AOC-V), No. 67 (AOC-PRI-2) and No. 68 (AOC-PRI-5).
- b. Indicate that the following SWMUs were also NFAed in January 2012: Numbers 39, 127, 135 and 170.

The Permittee shall note that the title of the subject “*Statement of Basis for Approval of No Further Action for Ten Solid Waste Management Units*” misrepresents the fact that eleven (11), not ten, SWMUs/AOCs are being considered for NFA status in this request. AOC-PRI-2 and