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

NOV 2012

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A. David Budak  
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550 Tabosa Avenue  
Holloman AFB NM 88310-8458

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 September 2012 Conditional Approval SD-08 Long Term Monitoring Report, Quarter 1, Winter 2012 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. Brent Hunt of our Asset Management Flight at (575) 572-5395.

Sincerely

  
A. DAVID BUDAK, GS-14, DAFC

Attachment:  
Response to Comments on Conditional Approval SD-08 LTM Report, Quarter 1, Winter 2012

cc:

(w/Atch)  
Mr. David Strasser  
Hazardous Waste Bureau  
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Albuquerque NM 87109-4127

(w/o Atch)  
Mr. Will Moats  
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Response to Comments  
SD-08 Long Term Monitoring Report, Quarter 1, Winter 2012, March 2012  
Holloman Air Force Base, New Mexico, EPA ID# NM6572124422  
HWB-HAFB-12-008

Comment No.	Section	Page	Comment	Response
Author	David Strasser NMED- Hazardous Waste Bureau, Albuquerque, NM		Date of Comments: September 20, 2012	Date of Response: October 8, 2012
1	General		On-site monitoring well (MW) SD-08-03 was part of an array of monitoring wells that have been used in the past for the investigation of site LF-10 (SWMUs 101 and 109), which is across Arkansas Avenue to the southeast of site SD-08. The NMED issued a Certificate of Completion for Corrective Action Complete (CAC) With Controls at site LF-10 on March 9, 2012. In the various investigations leading to this CAC determination, MW-SD-08-03 was referred to as MW-S10-07. During the last round of ground water sampling and analysis for MW-S10-07, concentrations of the explosive 2,4- Dinitrotoulene (2,4-DNT) exceeded the EPA Tap Water screening level of 0.22 µg/L at a level of 57 µg/L. Further sampling of explosives from MW-SD-08-03/S10-07 has not been conducted.	The comparison of the USEPA Tap Water screening levels (USEPA Regions 3, 6, and 9 Regional Screening Levels, May 2012) with groundwater samples collected from monitoring well MW-08-03 (and Site SD-08) is not valid for the following reasons: 1. As per the Holloman AFB Hazardous Waste Facility Permit #NM6572124422 § III.1 Ground Water Cleanup Levels; "NMED has established ground water cleanup levels for hazardous waste and/or hazardous waste constituents that incorporate both WQCC (NMAC 20.6.2.3103, Sept 2002) and EPA's National Primary Drinking Water Standards Maximum Contaminant Levels (USEPA, May 2009). If both the WQCC ground water standard and an MCL have been established for an individual hazardous waste and/or constituents, then the lower of the two levels will be the cleanup level for that hazardous waste and/or constituents." There is no reference in the Permit to compare groundwater analytical data collected from HAFB monitoring wells to the EPA tap water

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			Therefore, the Permittee shall analyze the ground water from MW-SD-08-03 for explosives for two consecutive quarters and provide the results in the subsequent Monitoring Reports.	RSLs. 2. The MW-08-03 groundwater sample collected during the SD-08 1 <sup>st</sup> Quarter LTM sampling event had a total dissolved solids (TDS) concentration of 11,800 mg/L. In addition, the average SD-08 TDS concentration for the 1 <sup>st</sup> Quarter 2012 was 10,006 mg/L. Furthermore, TDS concentrations greater than 10,000 mg/L are classified by the USEPA as a Class IIIB aquifer which is designated as unfit for human consumption (Final Draft Guidelines for Groundwater Classification under the EPA Groundwater Protection Strategy, USEPA, 1986). As a result of this classification the human ingestion of groundwater from MW-08-03 (and Site SD-08) is an invalid pathway.
2	General		For future ground water monitoring activities at site SD-08, the Permittee is reminded that the NMED requires that samples be analyzed using Total (unfiltered) analysis for mercury and organics and that Dissolved (filtered) analysis be used for all other metals.	Concur; all future SD-08 groundwater sampling events (starting with the 4 <sup>th</sup> Quarter, Fall 2012) will only analyze total (unfiltered) groundwater samples for Mercury. In addition, all SD-08 groundwater samples will continue to be analyzed for total VOCs and SVOCs and dissolved (filtered) TAL metals analysis.

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3	5.2.1	5-2	This Section indicates that the approved background concentration for arsenic is 25.93 ug/L. The actual NMED-approved background concentration for arsenic is set at the EPA MCL, or 10 µg/L. Therefore, future Monitoring Reports shall indicate that arsenic was present during this 1st quarterly report above background and the EPA MCL in MWs 08-02, 08-03, 08-06, 08-07 and 08-08. Future Reports shall consider the background for arsenic to be 10 µg/L.	As stated in the text (§ 5.2.1, 3 <sup>rd</sup> para, 3 <sup>rd</sup> sent.) “However, the calculated upper tolerance limit (UTL) for arsenic established during the HAFB Basewide Background Study (NationView Bhate JV III, 2011), is 25.93 µg/L”. This was not meant to imply that 25.93 µg/L is the NMED approved background level (10 µg/L), the intent for using the UTL was to only show the statistical range of arsenic. In addition, all of the NMED Approved Background Levels (Dissolved and Total TAL Metals) are presented in Table 3, SD-08 Groundwater Analytical Data (January 2012). Furthermore, the approved NMED background level for arsenic (10 µg/L) is also included in all future SD-08 LTM Reports.
4	Table 3		For future Reports, under the "Basewide Background" columns, delete the columns referring to "Dissolved Metals in Groundwater" and "Total Groundwater Background Level". Only the NMED-approved background concentrations shall be shown.	The column headers for the future SD-08 LTM Reports have been revised to read; “Dissolved Metals in Groundwater UTL” and Total Metals in Groundwater UTL” to avoid any confusion with the “NMED Approved Background Levels”.

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			End of Comments	