



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

DEC 03 2012

A. David Budak
Deputy Base Civil Engineer
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

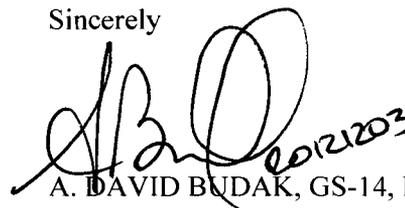
Dear New Mexico Environment Department

Holloman Air Force Base is pleased to submit the response to comments to your November 2012 Conditional Approval Release Assessment Report, Site SS-18, February 2011 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 Release Assessment Report, Site SS-18, February 2011

cc:

(w/Atch)
Mr. David Strasser
Hazardous Waste Bureau
5500 San Antonio Dr. NE
Albuquerque NM 87109-4127

(w/o Atch)
Mr. Will Moats
Hazardous Waste Bureau
5500 San Antonio Dr. NE
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Mr. Chuck Hendrickson
USEPA, Region 6 (6PD-F)
1445 Ross Ave., Ste 1200
Dallas TX 75202-2750

Response to Comments
 Final Release Assessment Report Site SS-18
 Holloman Air Force Base
 New Mexico

Comment No.	Section	Page	Comment	Response
Author	David Strasser NMED Hazardous Waste Bureau		Date of Comments: November 1, 2012	Date of Response: November 6, 2012
1	7	General	<p>The conclusions and recommendations offered in the subject Report do not adequately address the presence of metals (arsenic, manganese and thallium) in concentrations in the ground water in excess of the approved basewide background levels and maximum contaminant levels. In order to show that the concentrations of these metals in ground water can be considered as background concentrations specific to the site (as specified in the Report conclusions), the Permittee must analyze ground water from three (3) locations outside of the established volatile organic compound (VOC) plume for Target Analyte List metals. These samples can be collected from existing monitoring wells and the data provided in the report that will be submitted providing the results of the additional characterization activities proposed in the subject Report.</p>	<p>Concur. The Final SS-18 ACM Completion Report will compare ground water metals data (e.g., arsenic, manganese and thallium) collected within the VOC plumes (1,1-DCA, 1,1-DCE, PCE and TCE) that exceeded the NMED approved HAFB background levels and applicable regulatory action levels (USEPA MCLs and NMWQCC standards) to metals data collected from three monitoring wells which are located outside the boundaries of four VOC plumes. This comparison will assist determining if the metal exceedences within the VOC plumes are within SS-18 site specific background levels.</p>

Response to Comments
 Final Release Assessment Report Site SS-18
 Holloman Air Force Base
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Author	David Strasser NMED Hazardous Waste Bureau		Date of Comments: November 1, 2012	Date of Response: November 6, 2012
2	6.1.2	General	In the forthcoming supplemental release assessment report, the Permittee shall provide individual VOC isoconcentration maps on separate figures for each of the various contaminants in ground water (e.g. 1,1-DCA, TCE, etc.) and one figure showing the combined isoconcentrations.	Concur. The SS-18 ACM Completion Report, will present individual VOC plumes (i.e., 1,1-DCA, 1,1-DCE, PCE and TCE) in a three-dimensional (3-D) isosurface format (volumetric rendering) for each VOC detected above the MCL, utilizing Voxler3 [®] software. In addition, one figure will show the combined isoconcentration contours for all VOCs above applicable action levels in a plan view (2-D) figure.
			End of Comments	