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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

March 25, 2013

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

**RE: DISAPPROVAL  
VOLUNTARY CORRECTIVE MEASURES REQUEST  
SEPTIC SYSTEM SITES, JANUARY 2012  
HOLLOMAN AIR FORCE BASE  
EPA ID # NM6572124422  
HWB-HAFB-12-002**

Dear Mr. Budak:

The New Mexico Environment Department (NMED) has reviewed Holloman Air Force Base's (the Permittee's) Voluntary Corrective Measures Request for Septic System Sites, dated January 2012 and received on January 23, 2012. Upon review, NMED has identified the following deficiencies that must be addressed:

**General Comments**

1. On April 30, 2007 the Permittee submitted a Solid Waste Management Unit (SWMU) Assessment Report (SAR), as requested by the NMED, to address the status of the septic systems situated at various locations throughout the facility. NMED's review of this SAR resulted in the issuance of two Notices of Disapproval (NODs) dated September 13, 2007 and June 19, 2008. The Permittee provided responses to the NOD comments on March 13, 2008 and August 25, 2008, respectively. Most of the comment responses stated that the issue in question would be addressed in a future work plan. A RCRA Facility Investigation Work Plan for Basewide Septic Tanks (RFI WP) was submitted on

February 5, 2009 and approved by the NMED on January 13, 2010. The final RFI WP is dated October 2009.

The approved 2009 RFI WP included a listing of **inactive** and **removed** septic tank systems identified by their respective building numbers that require additional investigation (see Figure 3-1 of the RFI WP). Active systems are not required to be investigated while still in use. Based on a review of the information presented in the SAR, septic tank systems were assigned to one of three investigation categories: Category 1 systems required further site investigation. Category 2 systems required further research and/or site work to determine if further site investigation was required. Category 3 systems required no further investigation. Nine sites were placed into Category 1 and twenty-four sites were placed into Category 2, for a total of thirty-three sites.

The subject Voluntary Corrective Measures Request [Work Plan] for Septic System Sites (WP) identified only seventeen sites that would be subject to the proposed investigation activities. These included the nine Category 1 systems (building numbers 308, 1190, 1194, 1199, 1200, 1201, 1221, 1251 and 1269) and eight of the Category 2 systems (building numbers 920, 921, 922, 924, 1166, 1175, 1176 and 1196). The WP does not address the sixteen remaining Category 2 systems. These systems are either removed or inactive. The removed systems include building numbers 638, 642, 1155, 1168 and 1173. The inactive systems include building numbers 639, 640, 700, 702, 1158, 1174, 1178, 1179, 1180 and 1183. Building 1142 is listed as both inactive and removed. The approved 2009 RFI WP specifies the technical approach to be taken to investigate the Category 1 and Category 2 sites. NMED expects these technical approaches to be followed.

The Permittee must provide an explanation as to why the remaining sixteen Category 2 systems have not been included in the subject WP and how they are to be addressed. The Permittee must also provide assurances that the approved investigative technical approaches will be followed, in addition to the other proposed investigation activities.

2. The two previously mentioned SAR NODs also required that the Permittee confirm whether or not septic systems existed at the buildings along the entire length of the High Speed Test Track (with the exception of those at the extreme southern end of the track, which have been addressed) and at the Early Missile Test Site (Site OT-37, AOC-L). The Permittee's responses indicated that these locations would be addressed in the forthcoming RFI WP. These sites have not been addressed in either the 2009 RFI WP or the subject WP.

The Permittee must identify all buildings along the entire length of the test track and at Site OT-37 that historically used or are presently using septic systems. The Permittee must provide the locations of these systems and a description of the historical activities

associated with each building and current status to allow the NMED to determine if these systems require further investigation.

3. The subject WP does not address how the Permittee intends to investigate sites where septic systems have already been removed.

Provide the technical approach for investigating the removed-system sites as this procedure will likely be different from the approach proposed in the VCM WP for the inactive, in-place systems.

4. The Permittee must revise the WP to include analysis for nitrate for all soil and groundwater samples submitted for laboratory analyses.

### **Specific Comments**

5. **Page 1-1, Section 1.0, 2<sup>nd</sup> Paragraph and Section 5.0 (References)**

Section 1.0 specifies regulatory criteria in the form of action levels that are based on outdated guidelines. Revise this Section and the References to state that the most current screening and cleanup levels will be used. This will include use of the February 2012 version of the NMED Soil Screening Levels, the November 2011 version of the EPA Regional Screening Levels, and the December 28, 2011 version of the approved base-wide background levels.

6. **Page 1-1, Section 1.0, 2<sup>nd</sup> Paragraph**

The Permittee must provide a statement in this paragraph that all soil and groundwater analytical results for metals will be compared against the approved base-wide background levels as well as against the applicable cleanup levels.

7. **Page 1-4, Section 1.5, Last Sentence and Page 2-2, Section 2.3, Last Sentence**

The Permittee states that the culmination of the WP implementation activities would be the filing of a petition for a change in status to Corrective Action Complete (CAC) and a Class 3 Permit Modification.

The Permittee is advised that none of these sites will be considered SWMUs requiring corrective action unless and until they are added to Permit Appendix 4-A, Table A (*Summary of SWMUs/AOCs Requiring Corrective Action*). If, after the approved WP is implemented, a particular septic tank site does not contain residual contamination at concentrations greater than applicable risk-based cleanup levels, it will not be added to Table A. If the summary investigation report indicates otherwise or is inconclusive, the

Permittee must submit a request for a Class 1 Permit Modification to add the sites in question to Permit Table A.

**8. Page 1-7, Table 1-2**

This Table provides a Site Description of Site ID #OT-C350, Building 308. However, it does not specify that the building was formerly used as a hazardous waste accumulation area, as was stated in the Permittee's March 13, 2008 NOD comment responses.

Revise this Table to include a more detailed description of these past waste accumulation activities.

**9. Page 3-4, Section 3.7, 2<sup>nd</sup> Paragraph, 4<sup>th</sup> Sentence and 3<sup>rd</sup> Paragraph, 1<sup>st</sup> Sentence and Page 4-2, Section 4.4, 8<sup>th</sup> Sentence**

These sentences indicate that if Total Dissolved Solids (TDS) concentrations in groundwater exceed 10,000 mg/L at a particular site, that no additional analytical parameters will be analyzed. This is not acceptable.

The Permittee must revise these paragraphs to state that groundwater at all sites will be analyzed for all proposed parameters, regardless of TDS concentrations. The 3<sup>rd</sup> paragraph of Section 3.7 must also be revised to remove the reference to TDS being less than 10,000 mg/L. Should groundwater contaminants exceed action levels, regardless of TDS concentrations, the Permittee must submit a Technical Memorandum, as proposed in the 2009 RFI WP, to NMED proposing future investigation or remedial activities at the site and to add the site to Permit Table A.

**10. Figure 3-2, Schedule**

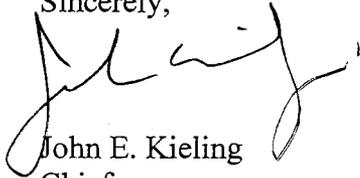
The Permittee must submit a revised Project Schedule.

The Permittee must submit a revised Work Plan [VCM Request] that corrects the deficiencies noted above by **May 30, 2013**. As part of the response letter that accompanies the revised Request, the Permittee shall include a table that details where all revisions have been made to the Request and that cross-references NMED's numbered comments. All submittals (including figures and tables) must be in the form of two paper copies and one electronic copy (in MS Word™ format). In addition, the Permittees must submit an electronic redline-strikeout version that includes all changes and edits to the Request.

Mr. David Budak  
March 25, 2013  
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If you have any questions regarding this matter, please contact David Strasser of my staff at (505) 222-9526.

Sincerely,



John E. Kieling  
Chief  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
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