



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



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Kieling

AUG 1 2013

NMED  
Hazardous Waste Bureau

DeAnna M. Rothhaupt  
Chief, Environmental Compliance/Restoration  
550 Tabosa Avenue  
Holloman AFB NM 88330-8458

New Mexico Environment Department  
Attn: Mr. John Kieling, Chief  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East, Building 1  
Santa Fe NM 87505-6303

Dear Mr. Kieling

In accordance with paragraph D.1.b of Appendix I to 40 CFR §270.42, Holloman Air Force Base is requesting a Class 1 Permit Modification to the Expanded Closure and Post-Closure Plan for the 20,000-pound Open Detonation Unit (New Mexico Environmental Department permit number: NM6572124422). This modification is required to update the closure schedule (Table 2-1) on page 2-6 to reflect the new estimated activity dates. Attached is the proposed new schedule which is subject to change.

Funding for the current contract allowed progress to the soil and groundwater sampling event identified in Section 2.6.3 (step 9, listed in Table 2-1 "Proposed Closure Schedule"). Continued closure activities will resume after a new contract is awarded. We anticipate awarding a New Mexico-Arizona Performance Based Restoration (NM-AZ PBR) contract which includes this closure activity by 30 September 2013. After selection and award, Holloman AFB and the NM-AZ PBR contractor will work together to develop an accurate schedule for the continued closure process. Additional updates to the closure schedule will be required at that time.

If you have any questions, please contact DeAnna Rothhaupt, Chief of Environmental Compliance and Restoration, at 575-572-3931 or by e-mail at [deanna.rothhaupt@holloman.af.mil](mailto:deanna.rothhaupt@holloman.af.mil).

Sincerely

DeAnna M. Rothhaupt, GS-12, DAFC

Attachment:  
Revised schedule, table 2-1 (Pages 2-5 & 2-6)

cc:  
(w/ Atch)  
Mr. Dave Cobrain  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East, Bldg 1  
Santa Fe NM 87505-6303

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

(w/o Atch)  
Mr. Chuck Hendrickson  
USEPA, Region 6 (6PD-F)  
1445 Ross Ave, Ste 1200  
Dallas TX 75202-2750

## 2.9 Surface Grading

This section clarifies the permit text in Section F under the heading "Surface Grading."

The OD Unit will be graded as required in the permit and follow natural contours. The area will be allowed to revegetate naturally.

## 2.10 Decontamination

This section clarifies the permit text in Section F under the heading "Decontamination."

All field equipment (large and small field instruments and tools) will be properly decontaminated in accordance with HAFB Standard Operating Procedure (SOP) No. 2, *Sampling Equipment Decontamination* (included in the *Basewide Quality Assurance Project Plan (QAPP)* (Bhate, 2003b)), prior to use and in between sampling to eliminate cross contamination of soil samples and minimize contamination leaving the site.

Small equipment such as sampling tools will be decontaminated using laboratory-grade detergent and water using a brush, followed by tap water rinse and two distilled water rinses. If necessary, large equipment, such as a truck, will be decontaminated by steam cleaning using hot/pressure washer at a temporary decontamination pad set up at the site.

All decontamination fluids will be contained and drummed, properly labeled as non-hazardous waste, and transported under non-hazardous waste manifest to a permitted disposal facility for disposal.

## 2.11 Schedule for Closure

This section clarifies the permit text in Section F under the heading "Schedule for Closure."

The schedule for closure was modified to include this Expanded Closure and Post-Closure Plan and its subsequent review and probable approval by NMED. It is also modified to reflect that HAFB notified NMED on March 30, 2011, that the OD Treatment Unit would be closed. We note that the last waste was treated on March 3, 2011.

The schedule for closure is anticipated to be as follows:

**Table 2-1. Proposed Closure Schedule**

| Closure Activity   | Closure Period |
|--|----------------|
| Received and treated final volume of waste                                       | March 3, 2011  |
| HAFB notified NMED of intent to close  | March 30, 2011 |
| Expanded Closure and Post-Closure Plan submitted to NMED for review and approval | July 18, 2011  |

**EXPANDED CLOSURE AND POST-CLOSURE PLAN  
FOR THE 20K OD TREATMENT UNIT**

**HOLLOMAN AFB,  
NEW MEXICO**

| <b>Closure Activity</b>   | <b>Closure Period</b>   |
|---|---|
| NMED review and approval period   | July 18 to August 29, 2011  |
| Expanded Closure and Post-Closure Plan (revised to address NMED comments) submitted to NMED for approval  | February 2012   |
| NMED approval   | March 2012  |
| Site reconnaissance (Pre-Final Inspection)  | April 2012  |
| Remove debris   | April 2012  |
| Soil and groundwater sampling and analysis and sampling equipment decontamination   | May 2012  |
| Analytical quality control (QC) (to ensure sampling and analysis is sufficient to demonstrate clean closure)  | <del>June 2012</del> <u>February 2014</u>                                   |
| Site grading and equipment decontamination  | <del>July 2012</del> <u>March 2014</u>                                      |
| Prepare closure certification/post-closure documentation (includes HAFB review period)  | <del>July 2012—October 2012</del> <u>March 2014 – July 2014</u>             |
| Submit closure certification to NMED  | <del>October 2012</del> <u>August 2014</u>                                  |
| NMED review of closure certification  | <del>November 2012—January 2013</del> <u>September 2014 – November 2014</u> |
| NMED issues post-closure permit   | <del>February 2013</del> <u>December 2014</u>                               |
| Periodic post-closure visual checks   | 30 years after issuance of post-closure permit                              |
| Conduct other post-closure care activities  | To be determined  |
| <p>Note that this schedule does not include any notification to NMED of any closure standard exceedances. If concentrations are found to exceed the standards for closure listed in the <i>Sampling and Analysis Plan</i>, included in Appendix A of this Expanded Closure and Post-Closure Plan), the schedule will be modified to include the notification and the development and implementation of a Corrective Action Work Plan.</p> <p>The schedule assumes that <del>only one revision was</del> <u>several revisions could be</u> required after the initial NMED review of the Expanded Closure and Post-Closure Plan and that only one revision <del>will</del> <u>should</u> be required for the closure certification and post-closure documentation.</p> |   |

## 2.12 Certification of Closure

This section clarifies the permit text in Section F under the heading “Certification of Closure.”