



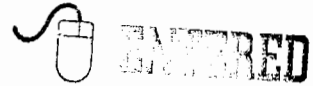
DEPARTMENT OF THE AIR FORCE

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

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SEP 3 2013

NMED  
Hazardous Waste Bureau



08-29-2013 A08:17

DeAnna Rothhaupt  
Chief, Holloman AFB Environmental  
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

Holloman Air Force Base is pleased to submit the Final DP-30/SD-33 Grease Trap Disposal Pits and Cooking Grease Disposal Trench (SWMU 113B) Accelerative Corrective Measures Completion Report 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 me at at (575) 572-3931 or by e-mail at [deanna.rothhaupt@holloman.af.mil](mailto:deanna.rothhaupt@holloman.af.mil).

Sincerely

DEANNA ROTHHAUPT, GS-12, DAF  
Chief, Holloman AFB Environmental

Attachment:  
Final DP-30/SD-33 Grease Trap Disposal Pits and Cooking Grease Disposal Trench (SWMU 113B) Accelerative Corrective Measures Completion Report

cc:

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

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



**TETRA TECH**

18 July 2013

T93002

Mr. Charlie Lawton  
49 CES/CEVR  
550 Tabosa Avenue  
Holloman Air Force Base, New Mexico 88330

Subject: Submittal of the ACM Completion Report for DP-30/SD-33 Grease Trap Disposal Pits and Cooking Grease Disposal Trench [Solid Waste Management Unit (SWMU) 113B], Holloman Air Force Base, Alamogordo, New Mexico, June 2013.  
Milestone Task: 10.4, 10.5

Reference: Contract No. FA4890-06-D-0009, Task DBR2 5002

Dear Mr. Lawton:

Please find enclosed three hard copies and four electronic copies of the ACM Completion Report for DP-30/SD-33 Grease Trap Disposal Pits and Cooking Grease Disposal Trench [Solid Waste Management Unit (SWMU) 113B], July 2013, for the referenced task order. Tetra Tech has addressed the comments provided by the installation. We have revised the document accordingly for submittal to NMED and attached a copy of the comment response to this letter for your file.

If you have any questions or concerns regarding this report, please feel free to contact me at (865) 220-4772 ([frank.bogle@tetrattech.com](mailto:frank.bogle@tetrattech.com)) or Allan Jenkins at (865) 556-8662 ([allan.jenkins@tetrattech.com](mailto:allan.jenkins@tetrattech.com)). We appreciate the opportunity to be of service to AFCEC and HAFB.

Respectfully Submitted,  
**TETRA TECH, INC.**

Frank R. Bogle, PG, CPG  
Senior Project Manager

Enclosures: As stated

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**Comment Response Matrix - Holloman AFB, New Mexico**  
**Draft ACM Completion Report**  
**DP-30-SD-33**

Comments Received 10 July 2013

#	Location			Comment	Reviewer	TetraTech Response
	Page	Line	Section			
1	vi	7	-	Acronym TCE Should be "Trichloroethylene/Trichloroethene" to clarify synonymic usage throughout the document.	DLR	<i>Acronym has been revised.</i>
2	3-2	1	3.2.1	"DP-30/SD-3" Should Be "DP-30/SD-33"	DLR	<i>Text has been corrected.</i>
3	3-1, 3-2, 3-6, 4-3		3.2, 3.2.2, 3.4.4, 4.2	<p><u>Why are we comparing TCE levels to NMWQC instead of MCLs?</u></p> <p><b>Reference RCRA Part B Permit: (Holloman Permit)</b>            Sec. III.1 Ground Water Cleanup Levels            NMED has established ground water cleanup levels for hazardous waste and/or hazardous constituents that incorporate both the WQCC and EPA's National Primary Drinking Water Standards Maximum Contaminant Levels (MCLs).</p> <p>If both the WQCC ground water standard and an MCL have been established for an individual hazardous waste and/or constituents, <b><u>then the lower of the two levels will be the cleanup level</u></b> for that hazardous waste and/or constituents.</p> <p><b>WQCC is 100 ug/l &amp; MCL is 5 ug/l</b></p>	DLR	<p><i>The rationale is as follows: NMED accepted that groundwater at the site is not potable based on high TDS concentrations (per statement in the approved ACM WP, Section 4.1, last paragraph). Since the report concludes that groundwater is not drinkable, and there is no receptor, it is proposed that it is not necessary to clean up to drinking water standards (Section 3.2); thus, drinking water standards like MCLs would not apply. Strictly speaking, the NMWQCC standards apply to water with background TDS less than 10,000 mg/L, and they also do not apply to the site. The report included NMWQCC criteria as a point of reference.</i></p> <p><i>[Note: A new reference for the TDS data, Table C-3, has been added in the first paragraph in Section 3.2, for convenience of the reader.]</i></p> <p><i>The report is consistent with the RCRA Permit, Appendix 4-F, Section 1.0 wherein it states that the Permittee "may use site-specific data to develop cleanup levels as provided for in NMED (2000), now NMED (2012)." NMED (2012) Section 1.2.1 discusses the requirements for completed exposure pathways, impacts to a potable aquifer or water-bearing unit, and site-specific evaluation of risk. Section 3.2 and subsections address all of those criteria for groundwater (i.e., only the vapor intrusion pathway is potentially complete for groundwater).</i></p> <p><i>Finally, Table 3-1 has been revised to show the vapor intrusion (VI) risk number presented in the report for TCE (i.e., 24.1 ug/L) as the screening value (SV), in lieu of NMWQCC or the MCL; based on above discussion, this is the most appropriate value and was already incorporated into Figure 3-1. Table C-3 in Appendix C has similarly been revised to incorporate the lower of NMWQCC or MCLs as the SV, but also identifies exceedance of the VI criteria for TCE per the above discussion (explained in the footnotes).</i></p>
4	-	-	4	Additional exceedances shown in Appendix A, Figure 3.8 should be summarized in the conclusions and recommendations to include risk data to support the soil exceedances for PCB's, TPH, Chromium, and TCE.	DLR	<i>Exceedances shown on Appendix A, Figure 3.8, for waste and adjacent soil are mitigated by the LUC that prevents contact with the materials. Therefore the exposure pathway is incomplete. The text in Sections 3.1 and 4.1 has been revised to emphasize this point.</i>

**Comment Response Matrix - Holloman AFB, New Mexico**  
*Draft ACM Completion Report*  
**DP-30-SD-33**

**Comments Received 10 July 2013**

#	Location			Comment	Reviewer	TetraTech Response
	Page	Line	Section			
5	-	-	4.2	CAC With controls. What controls are recommended?	DLR	<p><i>Because the reasonable, foreseeable future use of the site is undeveloped land, the LUC will consist of signage (i.e., engineering control), inspection monitoring, and surface maintenance to prevent disturbance, contact, and building over or in direct proximity to the disposal trenches and plume.</i></p> <p><i>Also, with NMED approval, the site will be moved from Permit Table A, "SWMUs/AOCs Requiring Corrective Action" to Table C "SWMUs/AOCs With Corrective Action Complete With Controls".</i></p> <p><i>Section 4.1 has been revised to include the above LUC recommendation.</i></p>
6						
7						

Reviewer: Please provide your name, title, commercial phone number, and date of comments

- *David L. Rizzuto, Restoration Contractor 575-572-5395 david.rizzuto.ctr@holloman.af.mil*