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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 20, 2013

Ms. DeAnna Rothhaupt
Chief, Compliance and Restoration
49 CES/CEAN
550 Tabosa Avenue
Holloman AFB, NM 88330-8261

**RE: DISAPPROVAL
ACCELERATED CORRECTIVE MEASURES COMPLETION REPORT,
SS-02/05 POL STORAGE TANK SPILL SITES 1 AND 2, APRIL 2011
HOLLOMAN AIR FORCE BASE
EPA ID # NM6572124422
HWB-HAFB-11-009**

Dear Mr. Budak:

The New Mexico Environment Department (NMED) has reviewed Holloman Air Force Base's (the Permittee's) *Accelerated Corrective Measures Completion Report for Sites SS-02/05, POL Storage Tank Spill Sites 1 and 2 (AOC-T)*, (Report) dated April 2011 and received on July 22, 2011. Upon review, NMED has identified deficiencies that must be addressed and that are discussed below.

In a letter dated October 25, 2005, the NMED approved the *Additional Investigation Requirements Work Plan for Site SS-02/05*, dated May 2005 (the Work Plan). This Work Plan provided the basis for the groundwater monitoring activities described in the subject Report.

Section 2.0 of the approved Work Plan stated that the objective of the Work Plan was to collect sufficient groundwater data to support the completion of a risk assessment evaluating potential groundwater exposure pathways relative to vapor impacts at the site. This was to be accomplished by installing two new groundwater monitoring wells downgradient of site SS-02/05 (which was completed) and sampling them along with the existing groundwater

monitoring well network on a semi-annual basis for two years. Section 2.4 of the Work Plan specified that the following groundwater monitoring wells were to have been sampled: the two new wells (MW-02/05-09A and MW-02/05-10), and existing wells MW-02/05-01, MW-02/05-02, MW-02/05-03, MW-02/05-04, MW-02/05-05, MW-02/05-06, and MW-02/05-08. Section 2.4 further stated that the groundwater samples would be analyzed for Volatile Organic Compounds (VOCs) and Semi-Volatile Organic Compounds (SVOCs) and that the results of the sampling activities would be submitted to the NMED in semi-annual monitoring reports.

The information provided in the Report indicates that the groundwater monitoring for the risk assessment was only conducted once, with some wells being sampled in 2005 and the rest in 2006. Five wells (MW-02/05-03, 05, 06, 08 and S1-MW3) were sampled in December 2005 for VOCs only and the same five wells were sampled in January 2006 but only for SVOCs. No semi-annual sampling was conducted and no semi-annual reports were submitted to the NMED. Thus, key provisions within the approved Work Plan that pertain to the sampling of groundwater were not fully carried out.

The Report states that groundwater data from the following wells were used in the risk assessment: MW-02/05-01, MW-02/05-02, MW-02/05-03, MW-02/05-04, MW-02/05-05, MW-02/05-06, and MW-02/05-08, MW-02/05-09, MW-02/05-09a, MW-02/05-10 and adjacent wells S1-MW3, SS02/05DP20, and SS02/05DP24. Wells DP20 and DP24 were temporary wells and are no longer available.

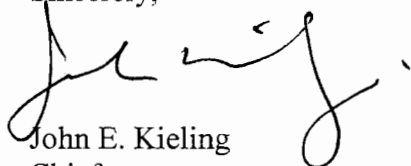
The NMED has determined that the risk assessment provided in the Report is not acceptable because only one round of sampling results was used and the latest sampling event occurred over six years ago (2006). Therefore, the Permittee is required to submit a Work Plan to NMED to conduct semi-annual sampling of groundwater at the aforementioned 11 permanent monitoring wells. The bi-annual sampling must be conducted for a minimum of two years, and the groundwater samples analyzed for VOCs, SVOCs, and Total Dissolved Solids. The Work Plan must also include provisions for the submittal of four semi-annual sampling reports, including a report outline, and the steps to be taken to prepare a revised risk assessment to evaluate groundwater exposure pathways relative to potential vapor impacts at the site.

The Permittee must submit the Work Plan to NMED that addresses the deficiencies noted above no later than **November 26, 2013**. All submittals (including figures and tables) must be in the form of two paper copies and one electronic copy (in MS Word/EXCEL™ format).

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

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
W. Moats, NMED HWB
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