



SUSANA MARTINEZ  
Governor

JOHN A. SANCHEZ  
Lieutenant Governor

NEW MEXICO  
ENVIRONMENT DEPARTMENT

*Hazardous Waste Bureau*

2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303  
Phone (505) 476-6000 Fax (505) 476-6030  
[www.nmenv.state.nm.us](http://www.nmenv.state.nm.us)



RYAN FLYNN  
Cabinet Secretary-Designate

BUTCH TONGATE  
Deputy Secretary

TOM BLAINE, PE  
Director  
Environmental Health Division

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

October 1, 2013

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

**RE: DISAPPROVAL  
ACCELERATED CORRECTIVE MEASURES COMPLETION REPORT FOR  
SITE SS-13, DECEMBER 2011  
HOLLOMAN AIR FORCE BASE  
EPA ID # NM6572124422, HWB-HAFB-12-001**

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 Site SS-13*, the Sodium Arsenite Spill Site (AOC-J), dated December 2011 and received on January 23, 2012. NMED issues this Disapproval with the following comments.

**1. General Comment**

Ground water sampling results show that arsenic values in ground water exceed the established cleanup level or the approved base-wide background level for arsenic in ground water of 10 micrograms per liter ( $\mu\text{g/L}$ ) in all four of the on-site monitoring wells. These values are as follows: MW-1 - 12.5  $\mu\text{g/L}$ ; MW-2 - 50.8  $\mu\text{g/L}$ ; MW-4S - 29.4  $\mu\text{g/L}$ ; and MW-4D - 34.2  $\mu\text{g/L}$ . The elevated values of arsenic in ground water at this site pose a particular concern since sodium arsenite was the substance spilled at this site. Additionally, the concentration of total dissolved solids (TDS) in three of the site's four monitoring wells is below 10,000 milligrams per liter (mg/L). The TDS concentrations are as follows: MW-1 - 5,150 mg/L; MW-2 - 8,630 mg/L; and MW-4S - 6,900 mg/L. Therefore, the NMED considers the ground water at this site to be subject to the New Mexico Water Quality Control Commission regulations 20.6.2 NMAC and is

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also subject to the cleanup levels as established by the Permittee's Facility Operating Permit at Part 4, Appendix 4-F, Section III.1.

The Permittee must present sufficient evidence to demonstrate to NMED that these elevated arsenic values should be considered as representative of background conditions, and not anthropogenic in origin or propose ground water remediation measures for NMEDs' consideration through submittal of a Corrective Measures Evaluation Report.

## **2. General Comment**

The subject *Report* did not include an acceptable figure depicting the locations of the soil borings and monitoring wells, nor did it include a site-specific potentiometric surface map or contaminant isoconcentration map. Figure 9-4 depicting the locations of soil borings and monitoring wells is not acceptable because the font size of the text shown on the figure labels is unreadable. In addition, NMED requires that all site figures include a north arrow and be to scale. They must also include a coordinate system (e.g., UTM, latitude/ longitude) and the boundaries of the site must be shown on the figures. High accuracy (+/-3 ft) GPS coordinates are acceptable.

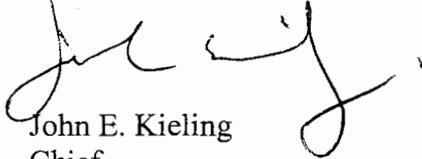
The Permittee shall provide figures meeting the above criteria showing the location of the soil borings and monitoring wells, the potentiometric surface of the site, and an isoconcentration map of arsenic contamination in the ground water.

The Permittee must address the concerns noted above in writing by no later than **November 15, 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  
C. Amindyas, NMED HWB  
D. Strasser, NMED HWB  
B. Salem, NMED HWB  
C. Hendrickson, EPA-Region 6 (6PD-N)

File: HAFB 2013 and Reading  
HAFB-12-001