



DEPARTMENT OF THE AIR FORCE

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

ENTERED

REC

FEB 3 2014

NMED  
Hazardous Waste Bureau

Mrs. DeAnna Rothhaupt  
Chief of Environmental  
550 Tabosa Avenue  
Holloman AFB NM 88330-5840

01-31-2014 A 11:00

New Mexico Environment Department  
Attn: Mr. John Kieling  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East, building 1  
Santa Fe NM 87105-6303

Dear Mr. Kieling,

Holloman Air Force Base is pleased to submit the response to comments to your March 25, 2013 Notice of Disapproval for the Voluntary Corrective Measures Request for Septic Sites. Attached you will find our responses to comments and corrected VCM document.

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 575-572-3931 or by e-mail at [deanna.rothhaupt@holloman.af.mil](mailto:deanna.rothhaupt@holloman.af.mil).

Sincerely

DEANNA ROTHHAUPT, GS-12, DAFC

Attachments:

- Response to Comments
- Revised VCM Request
- Revised Table 3-1, RFI Work Plan
- CD of VCM strike-through version in MS Word

cc:

(w/ Atch)  
Mr. David Strasser  
Hazardous Waste Bureau  
5500 San Antonio Dr. NE  
Albuquerque NM 87109

(w/o Atch)  
Mr. Will Moats  
Hazardous Waste Bureau  
5500 San Antonio Dr. NE  
Albuquerque NM 87109

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Mr. Chuck Hendrickson  
USEPA, Region 6 (6PD-F)  
1445 Ross Ave., Ste 1200  
Dallas TX 75202-2733

**RESPONSES TO NMED NOD – NOTICE OF DISAPPROVAL, VOLUNTARY CORRECTIVE MEASURES REQUEST SEPTIC SYSTEM SITES, JANUARY 2012  
HOLLOMAN AIR FORCE BASE EPA ID NO. NM6572124422, HWB-HAFB-12-002  
March 25, 2013**

Comment No.	NMED Comments	Holloman AFB Response	Section/Page Reference in Revised RFI Report
1	<p>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.</p> <p>The approved 2009 RFI WP included a listing of <b>inactive</b> and <b>removed</b> 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.</p> <p>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</p>	<p>The seventeen sites under the current work plan submitted were selected based primarily on category and contamination potential. It was not the intent of this work plan to investigate all of the sites at this time.</p> <p>The remaining sixteen Category 2 sites are currently under review. Holloman is in the process of obtaining a contract to finish the investigations on the remaining septic tanks as required by the RFI Work Plan for Basewide Septic Tanks (ACOE, 2009).</p> <p>Holloman will assure that all additional work plans generated will follow the guidance and technical approach provided in the RFI Work Plan for Basewide Septic Tanks (ACOE, 2009).</p>	General

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Comment No.	NMED Comments	Holloman AFB Response	Section/Page Reference in Revised RFI Report
	<p>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.</p> <p>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.</p>		
2	<p>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.</p> <p>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.</p>	<p>Buildings along the entire length of the test track that have septic systems were addressed in the Submittal of information on April 27, 2007, required by NMED letter dated August 30, 2006 "Septic tanks and Associated Drain Fields". All of the septic systems listed were included on the active list and did not require action at that time. Holloman has currently reviewed the status of these buildings and found that all are still active. These buildings include 1160, 1161, 1162, 1163 &amp; 1625.</p> <p>Building 1284 (Tuli Peak) was not included and was previously abandoned. This building has been added to the current category 2 sites in table 3-1 of RFI Work Plan for Basewide Septic Tanks (ACOE, 2009).</p> <p>Buildings from site SS-37 were also included in the survey. Building 1142, in table 3-1, is located in south area of site SS-37 (listed as both inactive and removed) and was the only building that housed a latrine.</p>	General

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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.	Septic system sites investigated as part of the Midwest PBR contract were investigated in general accordance with the investigation requirements for a Category 1 site as described in the RFI Work Plan for Basewide Septic Tanks (URS, 2009) regardless of whether the septic tank was fully intact, abandoned, or removed in entirety. The utility location survey performed as part of the contractor's intrusive activity SOP accurately located any remaining underground septic piping, tank structure, and leach field.	General
4	The Permittee must revise the WP to include analysis for nitrate for all soil and groundwater samples submitted for laboratory analyses.	Please note that at the time of receipt of the NOD the RFI investigation had already been performed in general accordance with the RFI Work Plan for Basewide Septic Tanks (URS, 2009) and approved by the NMED on January 13, 2010 which did not include analysis for nitrate in soil and groundwater samples.	General
5	<b>Page 1-1, Section 1.0, 2<sup>nd</sup> Paragraph and Section 5.0 (References)</b> 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 basewide background levels.	Referenced regulatory criteria will be revised and updated accordingly.	Page 1-1, Section 1.0, 2 <sup>nd</sup> paragraph and Section 5.0
6	<b>Page 1-1, Section 1.0, 2<sup>nd</sup> Paragraph</b> The Permittee must provide a statement in this paragraph that all soil and groundwater analytical results for metals will be compared against the approved	Text will be revised to include references to the approved base-wide background levels and most recent cleanup levels.	Page 1-1, Section 1.0, 2 <sup>nd</sup> paragraph

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	base-wide background levels as well as against the applicable cleanup levels.		
7	<p><b>Page 1-4, Section 1.5, Last Sentence and Page 2-2, Section 2.3, Last Sentence</b>                      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.</p> <p>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.</p>	Comment noted and a request for a Class 1 Permit Modification will be made as needed.	Page 1-4, Section 1.5, Last Sentence and Page 2-2, Section 2.3, Last Sentence
8	<p><b>Page 1-7, Table 1-2</b>                      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.</p>	Table 1-2 will be revised to note that Building 308 was used as a hazardous waste accumulation area.	Page 1-7, Table 1-2
9	<p><b>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</b>                      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</p>	Text will be revised to remove reference to the TDS potable water threshold. Groundwater will be sampled for the indicated analytical suite.	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

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	<p>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.</p>		
10	<p><b>Figure 3-2, Schedule</b>                      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 <b>May 30, 2013</b>. 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.</p>	A revised project schedule will be provided.	Figure 3-2

Table 3-1. Septic tank system sites identified by their respective building numbers, Holloman AFB, New Mexico.

Bldg Number	Year Completed	Dimensions <sup>1</sup>	Capacity <sup>2</sup>	Activity Status	Investigation Category	Analyses <sup>3</sup>
308	1965	TBD	TBD	Inactive	1	TPH, VOCs, SVOCs, and TAL Metals
639	NA	TBD	TBD	Inactive	2	TBD
640	NA	TBD	TBD	Inactive	2	TBD
700	NA	TBD	TBD	Inactive	2	TBD
702	NA	TBD	TBD	Inactive	2	TBD
920	1959	4'2"x7'x7'9.5"	1600	Inactive	2	TBD
921	1959	4'2"x7'x7'9.5"	1600	Inactive	2	TBD
922	1959	4'2"x7'x7'9.5"	1600	Inactive	2	TBD
924	1987	4'2"x7'x7'9.5"	1600	Inactive	2	TBD
1142	NA	TBD	TBD	Inactive	2	TBD
1158	NA	TBD	TBD	Inactive	2	TBD
1174	NA	TBD	TBD	Inactive	2	TBD
1178	NA	TBD	TBD	Inactive	2	TBD
1179	NA	TBD	TBD	Inactive	2	TBD
1180	NA	TBD	TBD	Inactive	2	TBD
1183	NA	TBD	TBD	Inactive	2	TBD
1190	1952	9'x4'x8'10"	3000	Inactive	1	TPH, VOCs, SVOCs, and TAL Metals
1194	1987	4'x4'x8'10"	1350	Inactive	1	TPH, VOCs, SVOCs, and TAL Metals
1196	1993	4'6"x11'x6'	1300	Inactive	2	TBD
1199	1957	TBD	500	Inactive	1	TPH, VOCs, SVOCs, and TAL Metals
1200	1954	4'x8'x4'	1000	Inactive	1	TPH, VOCs, SVOCs, TAL Metals, and Tritium
1201	1951	4'8"x9'4"x6'2"	650	Inactive	1	TPH, VOCs, SVOCs, TAL Metals, and Tritium
1221	1983	TBD	1100	Inactive	1	Explosives
1251	NA	TBD	TBD	Inactive	1	TPH, VOCs, SVOCs, and TAL Metals
638	NA	TBD	TBD	Removed	2	TBD
642	NA	TBD	TBD	Removed	2	TBD
1142	NA	TBD	TBD	Removed	2	TBD
1155	NA	TBD	TBD	Removed	2	TBD
1166	1960	TBD	450	Removed	2	TBD
1168	NA	TBD	TBD	Removed	2	TBD
1175	1949	5'1"x10'4"x6'10"	2970	Removed	2	TBD
1176	1959	TBD	640	Removed	2	TBD
1173	NA	TBD	TBD	Removed	2	TBD
1269	1966	4'6"x9'	500	Removed	1	TPH, VOCs, SVOCs, TAL Metals, and Tritium
1284	TBD	TBD	TBD	Inactive	2	TBD

Notes:  
 NA = Not Available  
 TBD = To Be Determined  
 1 = Dimension will be estimated from data collected during septic tank trenching and fluid sampling results.  
 2 = Capacity will be estimated from data collected during septic tank trenching and fluid sampling results.  
 3 = Analysis is for soil, groundwater, and tank fluid; finalized analytes will be determined from historical research and presented in technical memorandum.  
 VOCs = Volatile Organic Compounds  
 SVOCs = Semi-Volatile Organic Compounds  
 TPH = Total Petroleum Hydrocarbons  
 TAL Metals = Target Analyte List Metals  
 Although not listed polychlorinated biphenyls and total cyanide analysis may be required for soil, groundwater, and tank fluid.

<sup>1</sup> = foot  
<sup>2</sup> = inch

Investigation Category:  
 1 = Further site investigation required.  
 2 = Research required to determine if further site investigation is required.

Table 3-1



CB&I  
 1401 Enclave Parkway, Suite 250  
 Houston, Texas 77077  
 Tel: +1 281 531 3100  
 Fax: +1 281 531 3143  
 www.CBI.com

*Date: July 19, 2013*

*Project No.: 144106*

**TRANSMITTAL LETTER:**

**To:** Ms. Stephanie Ramon

Letter No. 144106 - 0110

**Address:** Environmental Programs Execution

ATTN: AFCEC/EXE Building 171

2261 Hughes Ave, Ste 155

Lackland AFB, TX 78236-9853

**Re:** Revised Final VCM Request, Septic System Sites

Contract No. FA8903-09-D-8580 Task Order No. 0013

**For:** Review  As Requested  Approval  Corrections  Submittal  Other

<i>Item No:</i>	<i>No. of Copies</i>	<i>Date:</i>	<i>Document Title</i>
WERC09-13-014	1 electronic copy	July 2013	<b>Revised Final Voluntary Corrective Measure Request, Septic System Sites, Holloman Air Force Base, New Mexico</b>

Please call with questions or comments. Thank you.

*Sincerely:* \_\_\_\_\_  
 Christopher Long  
 Technical Lead

**PC:** DeAnna Rothhaupt – Holloman AFB (4 hard copies, 4 compact disks)