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**NEW MEXICO
ENVIRONMENT DEPARTMENT**



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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 20, 2014

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

**RE: SWMU ASSESSMENT REPORTS, FIVE SUSPECTED AREAS OF CONCERN
HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422
HWB-HAFB-13-021, HAFB-13-022, HAFB-13-023, HAFB-13-024 AND HAFB-13-025**

Dear Ms. Rothhaupt:

In a letter dated September 18, 2013, the New Mexico Environment Department (NMED) notified Holloman Air Force Base (the Permittee) that, in accordance with the Hazardous Waste Facility Permit at Part 4, Section IV.B.3, the Permittee is required to submit Solid Waste Management Unit (SWMU) Assessment Reports (SARs) for five suspected areas of concern (AOCs), identified by the Permittee as follows: the Building 301 Concrete UST; the Remotely Piloted Aircraft FSST Wash Rack; the Former Skeet Range (TS851); the Former Skeet Range 2 (TS859); and the Jeep Target Area Skeet Range (TS862).

The Permittee responded in a letter dated November 20, 2013 that included SARs for the Building 301 Concrete UST and the Remotely Piloted Aircraft FSST Wash Rack. After review of these two SARs, the NMED has determined that further investigations are required at these sites to determine the extent of soil and/or groundwater contamination.

The November 20, 2013 response also included the Permittee's request that the NMED withdraw its requirement for SARs at the three remaining potential AOCs; the Former Skeet Range (TS851), the Former Skeet Range 2 (TS859), and the Jeep Target Area Skeet Range (TS862). The Permittee's rationale for this request is that these skeet ranges are proposed to be investigated and remediated under the Air Force's Military Munitions Response Program

(MMRP), which is conducted under the Defense Environmental Restoration Program (DERP) and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The Permittee believes that the MMRP process will meet the state's Resource Conservation and Recovery Act (RCRA) corrective action regulatory objectives. The NMED has determined that these sites, which have detections of lead and polyaromatic hydrocarbon contamination in surface soils at concentrations greater than human-health screening levels, must be investigated and remediated, as necessary, under the auspices of the aforementioned RCRA Hazardous Waste Facility Permit. The NMED does not believe that these skeet ranges, which are primarily used for recreational purposes, can be considered to be military ranges and notes that surface soils at the sites are contaminated with RCRA hazardous constituents. Therefore, SARs must be submitted for these three sites.

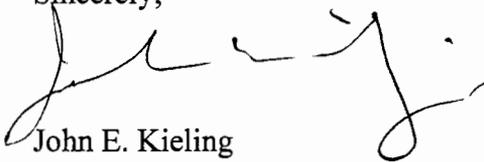
Regarding the Building 301 Concrete UST and the Remotely Piloted Aircraft FSST Wash Rack sites, the Permittee shall submit a work plan for a RCRA Facility Investigation (RFI) at each site for NMED approval as specified in the Hazardous Waste Facility Permit at Part 4, Section IV.E.1.

Regarding the three skeet ranges, the Permittee shall submit a SAR for each site as specified in NMED's September 18, 2013 letter. Based on the information provided in the SAR, the NMED will determine the need for further investigation. As an alternative, the Permittee may submit a RFI work plan for each site as specified above in lieu of a SAR.

The Permittee must submit the work plans or SARs by no later than **May 16, 2014**. All submittals (including figures and tables) must be in the form of two paper copies and one electronic copy (in MS Word/EXCEL™ format).

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)

Ms. Rothhaupt
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