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Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 14, 2014

Ms. DeAnna Rothhaupt
Chief, Holloman AFB Environmental
49 CES/CEIE
550 Tabosa Avenue
Holloman AFB, NM 88330-8458

**RE: EXEMPTION REQUEST FOR SOLID WASTE MANAGEMENT UNIT
ASSESSMENT REPORTS FOR THREE FORMER SKEET RANGES
HOLLOMAN AIR FORCE BASE
EPA ID # NM6572124422
HWB-HAFB-13-023, 024 and 025**

Dear Ms. Rothhaupt:

In a letter dated June 10, 2014, Holloman Air Force Base (the Permittee) reiterated its position that three former skeet ranges, *Former Skeet Range (TS851)*, *Former Skeet Range 2 (TS859)*, and the *Jeep Target Area Skeet Range (TS862)*, are best described as military ranges and again requested that the New Mexico Environment Department (NMED) allow the cleanup of these sites to be conducted in accordance with the *Air Force Guide for Conducting the Comprehensive Site Evaluation Phase I at Air Force Munitions Response Areas* and its Military Munitions Response Program authority. The NMED does not agree with the position taken by the Permittee in this matter.

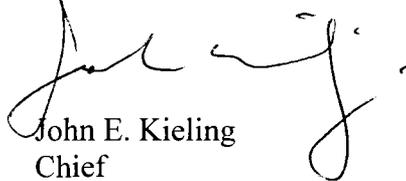
Lead and polyaromatic hydrocarbons contamination have been detected in surface soils, and waste piles are present on at least one of the ranges as acknowledged by the Permittee in the aforementioned June 2014 letter. Closed military ranges are fully subject to the corrective action requirements of the Resource Conservation and Recovery Act (RCRA), the New Mexico Hazardous Waste Act, and the New Mexico Hazardous Waste Management Regulations. Therefore, Solid Waste Management Unit (SWMU) Assessment Reports (SARs), or alternatively, RCRA Facility Investigation Work Plans (RFI WPs), must be submitted for these three closed ranges. Additionally, the waste piles must be cleaned up, and the waste from the piles managed for disposal in accordance with all applicable State and federal regulations.

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In a letter dated June 4, 2014, NMED affirmed the requirement for the submittal of SARs/RFI WPs for the three closed ranges and extended the submittal date to July 18, 2014. Given the Permittee's request that NMED reconsider the regulatory status of this matter, which has been addressed by this letter, NMED will extend the submittal date for the SARs/RFI WPs. Therefore, the revised due date for submittal of the SARs/RFI WPs is **August 29, 2014**. The SARs/RFI WPs must address cleanup of the waste piles in addition to the investigation of contaminated media at the three ranges.

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
D. Rizzuto, HAFB
C. Hendrickson, EPA-Region 6 (6PD-N)

File: HAFB 2014 and Reading
HAFB-13-023
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HAFB-13-025