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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

February 12, 2015

DeAnna Rothhaupt  
Chief, Holloman AFB Environmental  
550 Tabosa Avenue  
Holloman AFB, NM 88330

**RE: DISAPPROVAL  
SITE SS-18 ACCELERATED CORRECTIVE MEASURES  
COMPLETION REPORT, JUNE 2013  
HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422  
HWB-HAFB-13-006**

Dear Ms. Rothhaupt:

The New Mexico Environment Department (NMED) has reviewed the Holloman Air Force Base (the Permittee) *Site SS-18 Accelerated Corrective Measures Completion Report* (Report) dated June 2013 and received on June 24, 2013. NMED hereby issues this Disapproval for the reasons discussed below.

**Comment 1**

Section 9 states that "Based upon the soil and groundwater laboratory analytical results and the site-specific human health risk-based evaluation, No Further Action is recommended for site SS-18 (AOC-H)". The NMED does not agree with this recommendation.

**Comment 2**

Section 7.2 and Table 7.2, *Groundwater Analytical Results*, states that 22 Volatile Organic Compounds (VOCs) were detected at concentrations greater than their respective Method Detection Limits (MDLs) in the 43 groundwater samples collected (including duplicates and re-samples) from the 34 SS-18 monitoring wells (MWs) sampled. Of the 22 VOCs detected, five VOCs (1,1-Dichloroethane; 1,1-Dichloroethylene; cis-1,2-Dichloroethylene; Tetrachloroethylene [PCE]; and Trichloroethylene [TCE]) were detected above the corresponding New Mexico Water Quality Control Commission groundwater standard (20.6.2.3103 NMAC) and/or U.S.

Environmental Protection Agency Maximum Contaminant Level (MCL). Eight of the 34 SS-18 MWs contained concentrations of one or more VOCs in groundwater above their respective groundwater cleanup standards.

In addition, 21 samples analyzed for total (unfiltered) Target Analyte List (TAL) metals contained concentrations of metals greater than the corresponding MDL. Eight of the metals (aluminum, antimony, arsenic, chromium, cobalt, iron, manganese, and thallium) were detected in groundwater samples collected from 27 of the 34 SS-18 MWs above their respective groundwater cleanup standards. NMED notes that 26 of the MWs with contaminated groundwater contained total dissolved solids (TDS) concentrations below 10,000 milligrams per liter (mg/L). Pursuant to 20.6.2.3103 NMAC, maximum allowable concentrations of contaminants in groundwater that exhibits TDS concentrations at or below 10,000 mg/L shall not be exceeded. The latter applies regardless of the results of a site-specific risk analysis.

The following is a list of the Site SS-18 MWs where detected VOC and/or metals concentrations in groundwater are greater than applicable standards where groundwater TDS concentrations are below 10,000 mg/L:

SS18-MW02, SS18-MW04, SS18-MW05, SS18-MW06, SS18-MW07, SS18-MW09, SS18-MW10, SS18-MW11, SS18-MW12, SS18-MW13, SS18-MW14, SS18-MW15, SS18-MW16, SS18-MW18, SS18-MW19, SS18-MW21, SS18-MW22, SS18-MW23, SS18-MW25, SS18-MW26, SS18-MW27, SS18-MW28, SS18-MW29, S51-MW1, S51-MW5 and S51-MW7.

**Comment 3**

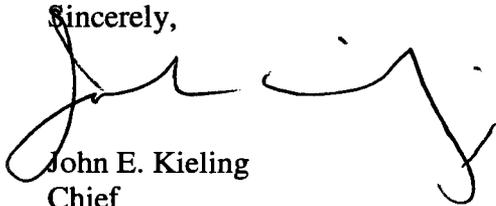
Figure 7-3 indicates that the southwesterly extent of groundwater contaminated by TCE has not been adequately defined.

NMED has determined that additional investigation is necessary to fully characterize groundwater contamination at this site, and that groundwater exhibiting contaminant concentration levels in excess of water quality standards must be remediated. NMED has determined that this Accelerated Corrective Measures Completion Report cannot be approved because corrective measures are not complete at the site. NMED acknowledges that on September 30, 2014, the Permittee submitted work plans for additional investigation and monitoring activities at this site. NMED will attempt to expedite the review of these work plans so that the proposed additional site characterization may proceed.

Ms. Rothhaupt  
February 12, 2015  
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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  
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