



NEW MEXICO   
ENVIRONMENT DEPARTMENT



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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

March 2, 2015

Ms. DeAnna Rothhaupt  
Chief, Holloman AFB Environmental  
49 CES/CEIE  
550 Tabosa Avenue  
Holloman AFB, NM 88330-8261

**RE: DISAPPROVAL  
FINAL SS-018 – RESOURCE CONSERVATION AND RECOVERY ACT  
FACILITY INVESTIGATION WORK PLAN, SEPTEMBER 2014  
HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422  
HWB-HAFB-14-015**

Dear Ms. Rothhaupt:

The New Mexico Environment Department (NMED) has reviewed the Holloman Air Force Base (Permittee) *Final SS-18 (AOC-H) - Resource Conservation and Recovery Act Facility Investigation Work Plan* dated September 2014 (hereafter the Work Plan) and received on September 30, 2014. NMED hereby issues this Disapproval for the reasons discussed below.

**Comment 1**

Section 1.1 of the Work Plan states that vapor intrusion is a concern and will be evaluated during the investigation. However, the Work Plan does not indicate how the vapor intrusion evaluation will be conducted. The Permittee shall amend the Work Plan to describe how the proposed vapor intrusion evaluation will be accomplished.

**Comment 2**

Section 3.5 of the Work Plan proposes the use of a Membrane Interface Probe (MIP) to detect both chlorinated and non-chlorinated volatile organic compound (VOC) contaminants in the subsurface. Due to the geologic conditions at the site, it has been determined that using the MIP for detecting and logging VOCs in the boreholes is not a viable alternative for subsurface characterization. Therefore, the Permittee shall collect soil samples and analyze them as proposed in the Work Plan at three (3) depths within each 15-foot

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deep borehole from the intervals based on field screening (e.g., visual, olfactory) including those with the highest photoionization detector (PID) readings. In the absence of elevated PID readings or other field screening evidence of the presence of contamination, samples shall be collected from the surface, at five feet below the surface, and from immediately above the water table at each borehole. The Permittee shall amend the Work Plan to include the changes discussed in this comment.

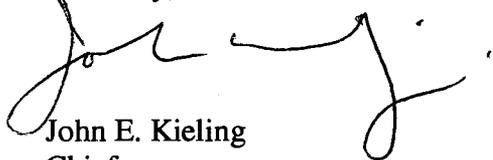
**Comment 3**

The Work Plan was originally submitted without a figure depicting the locations of the proposed boreholes and monitoring wells. At NMED's request, on December 9, 2014 the Permittee provided supplemental figures depicting the proposed borehole and monitoring well locations. The Permittee shall include these supplemental figures in the amended Work Plan. NMED also requests that for all future submittals, the figures and tables be combined into separate tabs/attachments at the end of the document text (main body) instead of being placed in different locations throughout the text and that every table page include the appropriate descriptive header.

The Permittee must submit an amended work plan by no later than **May 27, 2015**. The submittal (including figures and tables) must be in the form of a paper copy in a three-ring binder 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  
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File: HAFB 2015 and Reading  
HAFB-14-015