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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
GROUNDWATER MONITORING PLAN, SS-018 – CHROMIC ACID SPILL
SITE, SEPTEMBER 2014
HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422
HWB-HAFB-14-016**

Dear Ms. Rothhaupt:

The New Mexico Environment Department (NMED) has reviewed the Holloman Air Force Base (Permittee) *Groundwater Monitoring Plan, Site SS-018 (AOC-H) – Chromic Acid Spill Site* dated September 2014 (the Plan) and received on September 30, 2014. The NMED hereby issues this Disapproval for the reasons discussed below.

Comment 1

Section 3.1 of the Plan, *Monitoring Requirements*, proposes that groundwater sampling and analysis be conducted annually for a total of three years. NMED disagrees with this proposal and requires that the sampling and analysis be conducted on a quarterly basis for a minimum of two years, with the submittal of quarterly groundwater monitoring reports for NMED review. Monitoring requirements will be re-evaluated after the initial two-year monitoring period. The Permittee shall amend the Plan to include this change.

Comment 2

The U.S. Air Force, under its Emerging Issues Program, has acknowledged that there is a known co-occurrence of 1,4-dioxane with trichloroethene (TCE) in chlorinated solvent groundwater plumes. TCE is a major contributor to the groundwater contamination at site SS-018 and there is no historical evidence of testing for the presence of 1,4-dioxane.

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Therefore, the Permittee shall amend the Plan to include analysis of 1,4-dioxane in the first 3 rounds of the quarterly sampling events from all monitoring wells at the site. The reporting limit for 1,4-dioxane shall not exceed 1 microgram per liter (1 µg/l).

Comment 3

The 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 Plan. In addition, for all future submittals, combine the figures and tables into separate sections/attachments for inclusion in the document following the text (main body) instead of being placed in different locations throughout the text and ensure that every table page includes the appropriate descriptive header.

The Permittee must submit an amended monitoring 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
W. Moats, NMED HWB
C. Amindyas, NMED HWB
D. Strasser, NMED HWB
D. Rizzuto, HAFB
C. Hendrickson, EPA-Region 6 (6PD-N)

File: HAFB 2015 and Reading
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