

ENTERED



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RYAN FLYNN  
Cabinet Secretary  
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Deputy Secretary

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

May 29, 2015

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

**RE: DISAPPROVAL  
RCRA FACILITY INVESTIGATION REPORTS, GROUP 1 - SEPTIC SYSTEM  
SITES, BUILDINGS 308 (OT-C530), 920, 921, 922 (OT-C531), 924 (OT-C532), 1190  
(OT-C533), 1196 (OT-C535), 1199 (OT-C536), 1200 (OT-C537), 1201 (OT-C538),  
1221 (OT-C539), 1251 (OT-C540), 1166 (OT-C542) 1175 (OT-C543) AND 1176 (OT-  
C544), DECEMBER 2013  
HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422  
HWB-HAFB-14-003**

Dear Ms. Rothhaupt:

The New Mexico Environment Department (NMED) has reviewed the above referenced document submitted by Holloman Air Force Base (the Permittee) on April 22, 2014. This document included RCRA Facility Investigation (RFI) Reports for thirteen sites that had septic systems that were removed from 2002 through 2008. No releases have been reported from these systems. The investigations were conducted to determine if historical releases had occurred. Evidence of a release may result in the site being added to the list of Solid Waste Management Units/Areas of Concern included in the facility's Hazardous Waste Permit. NMED hereby issues this Disapproval for the reasons discussed below.

**Comment #1.** In a letter dated April 9, 2015, the NMED issued a Notice of Disapproval (NOD) for the Permittee's January 31, 2014 response to the NMED's March 25, 2013 NOD regarding the January 2012 Voluntary Corrective Measure Request (VCM Work Plan) for investigative activities at these thirteen sites. This NOD required that the Permittee collect groundwater samples from the monitoring wells installed at the septic sites that were the subject of the VCM Work Plan and analyze them for nitrate. Review of the

RFI Reports reveals that neither soil nor groundwater samples were analyzed for nitrate.

Therefore, the Permittee is required to collect samples from the septic site monitoring wells and analyze them for nitrate. These sites include Buildings 308 (OT-C530), 920, 921, 922 (OT-C531), 1190 (OT-C533), 1199 (OT-C536), 1166 (OT-C542) 1175 (OT-C543) and 1176 (OT-C544). Please see the following comment for the status of the remaining sites.

**Comment #2:** Groundwater and quantity sufficient for sample collection was not encountered at 20 feet below ground surface (bgs) at the Building 924 (OT-C532) site. Historical records for this building indicate that it was used for radar equipment assembly and munitions storage. Soil samples at the site did not exhibit any constituents of concern (COCs) above applicable cleanup standards. Given the historical use of this building and its close proximity to Building 921, at which no groundwater COCs were detected, no further investigation is required at this site.

**Comment #3.** Groundwater and quantity sufficient for sample collection was not encountered at 40 feet bgs at the Building 1196 (OT-C535) site. Historical records for this building indicate that it was used for missile assembly and communications equipment storage. Soil samples at the site did not exhibit any COCs above applicable standards. Therefore, no further investigation is required at this site.

**Comment #4.** A groundwater sample was not collected at the Building 1200 (OT-C537) site, which historical records indicate was constructed in 1954 and was a laboratory used to conduct aeromedical research on both humans and animals, including x-ray, surgery and autopsy rooms. Records also indicate that septic effluent at this site was collected in an earthen pit with a concrete cover, which was abandoned in January 2008. According to the RFI Report, groundwater was not encountered in sufficient quantities to collect samples at a depth of 20 feet bgs. Given the past use of this building and the fact that its septic discharge was collected in an earthen pit (not a septic tank or lined seepage pit), the Permittee is required to install another monitoring well through the former location of the earthen pit in an attempt to reach groundwater sufficient to collect a sample to a depth of 40 feet bgs and, if groundwater is encountered, collect a sample and analyze it for all of the constituents required by the approved work plan with the addition of nitrate.

**Comment #5:** Groundwater and quantity sufficient for sample collection was encountered at 27 feet bgs at the Building 1201 (OT-C538) site, which historical records indicate was constructed in 1951 and was a laboratory used to conduct aeromedical research on animals, including a mortuary and autopsy room. The septic system was abandoned in January 2008. A groundwater sample collected on July 12, 2012 resulted in a total dissolved solid (TDS) concentration of 12,600 milligrams/liter. Due to the elevated TDS concentration, no further analysis of the groundwater was conducted. On May 16, 2013, after allowing for monitoring well recharge, a second attempt was made to collect a sample, but groundwater was not encountered at 27 feet bgs. Given the past use of this build-

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ing, the Permittee is required to install another monitoring well through the former location of the septic system leach field in an attempt to reach groundwater sufficient to collect a sample to a depth of 40 feet bgs and, if groundwater is encountered, collect a sample and analyze it for all of the constituents required by the approved work plan with the addition of nitrate.

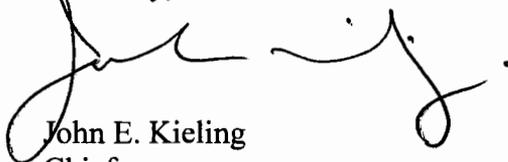
**Comment #6:** Groundwater and quantity sufficient for sample collection was not encountered at 35 feet bgs at the Building 1221 (OT-C539) site. Historical records for this building indicate that it was used for inert munitions storage. Soil samples at the site did not exhibit any COCs above applicable standards. Therefore, no further investigation is required at this site.

**Comment #7:** Groundwater and quantity sufficient for sample collection was not encountered at 50 feet bgs at the Building 1251 (OT-C540) site. Historical records for this building indicate that it was used as a research and testing shop, which has been vacant for more than twenty years. Soil samples at the site did not exhibit any COCs above applicable standards. Therefore, no further investigation is required at this site.

The Permittee shall submit an amended work plan for the required additional investigative activities to NMED on or before **July 29, 2015** 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  
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C. Hendrickson, EPA-Region 6 (6PD-N)  
L. King, EPA-Region 6 (6PD-N)

File: HAFB 2015 and Reading  
HAFB-14-003