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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 4, 2015

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

**RE: TS851A – FORMER SKEET RANGE, ENGINEERING EVALUATION/COST ANALYSIS, JUNE 2015
HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422
HWB-HAFB-13-023**

Dear Ms. Rothhaupt:

On July 13, 2015, the New Mexico Environment Department (NMED) received an *Engineering Evaluation/Cost Analysis (EE/CA)*, from Holloman Air Force Base (the Permittee) dated June 2015, for former skeet range TS851a. A preliminary review of this document revealed that, although the specific details differ, Munitions Response Site (MRS) TS851a and the larger MRS TS851 are quite similar to MRSs SR859 (Former Skeet Range 2) and TS862 (Jeep Target Area Skeet Range) for which NMED recently reviewed and disapproved a Remedial Investigation Work Plan (Investigation Work Plan or IWP) in a letter dated August 27, 2015. These MRSs are similar in that all three have lead shot and clay target debris scattered across the ground surface resulting in soil contaminant concentrations that exceed applicable soil screening levels.

NMED has not received an IWP or investigation report for MRS TS851/TS851a to review and cannot meaningfully review the EE/CA (which is similar to a RCRA Corrective Measures Evaluation) without first approving an investigation work plan for the site and a report presenting the results of the investigation. As stated in a letter to the Permittee dated July 14, 2014, NMED regulates corrective action at closed skeet ranges under the authority of the Resource Conservation and Recovery Act (RCRA), the New Mexico Hazardous Waste Act, the New Mexico Hazardous Waste Management Regulations, and the Facility's Hazardous Waste Permit. The clay target debris and lead shot apparently occurring throughout MRS TS851/ TS851a is clearly a waste that constitutes a hazard to human health and ecological receptors. Because no infor-

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mation has been made available to the NMED, it can only assume that the investigation proposed for TS851/TS851a was similar to those conducted for MRSs SR859 and TS862. For the latter two sites, NMED found that the sampling methods failed to detect lead shot at the sites and led to conclusions based upon results which are not representative of site conditions. Furthermore, a proper laboratory method was not used to analyze soil samples, and the number of samples collected was likely insufficient to have adequately characterized the sites. NMED directed that a sampling protocol be developed for investigation of MRSs SR859 and TS862 that includes extensive sampling of soil to ensure that all "hot spots" of contamination are detected, and that confirmatory sampling also must be conducted at areas that are remediated.

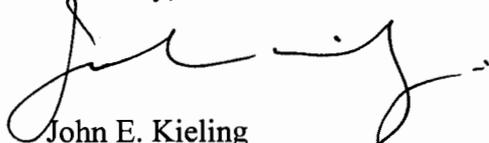
Furthermore, NMED indicated that for MRSs SR859 and TS862, the NMED preferred that, as an alternative to extensive area-wide sampling and analysis and assessment of risk, the Permittee propose a presumptive remedy for the MRSs to conduct remediation of soil to remove the waste lead shot and any other contaminants, followed by post-excavation confirmatory sampling. NMED also noted that there are available technologies designed specifically to clean up skeet and shooting ranges. Also, if a presumptive remedy is proposed for MRSs SR859 and TS862, NMED directed that the work plan must provide for post-excavation confirmatory sampling and hazardous and solid waste disposal.

With regard to MRS TS851/TS851a, the Permittee must submit the IWP and investigation report upon which the EE/CA was based. However, if the investigations carried out for MRS TS851/TS851a were similar to those for MRSs SR859 and TS862, NMED may not approve the IWP or the results of the investigation, and instead require corrective action similar to that for MRSs SR859 and TS862.

The Permittee shall submit the RI WP and investigation report for MRS TS851/TS851a to NMED on or before **December 4, 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

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cc: D. Cobrain, NMED HWB
W. Moats, NMED HWB
C. Amindyas, NMED HWB
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