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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 8, 2016

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

**RE: APPROVAL
REVISED FINAL RCRA FACILITY INVESTIGATION REPORT, BUILDING
131 WASHRACK, SITE SD-08 (SWMU-82), NOVEMBER 2014
HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422
HWB-HAFB-07-007**

Dear Ms. Rothhaupt:

The New Mexico Environment Department (NMED) has reviewed the above referenced Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Report submitted by Holloman Air Force Base (the Permittee) on November 19, 2014. NMED hereby approves the RFI Report. However, groundwater contamination from an adjacent site must be addressed separately as explained below.

The primary objective of the subject RFI Report for SD-08 (Solid Waste Management Unit [SWMU] 82) was to provide information to fill in data gaps to complete a comprehensive site-specific risk assessment in support of a corrective action complete determination. The historic contaminants of concern for site SD-08 were organochlorine pesticides discovered in 1991. This contamination was the result of cleaning trash trucks at a wash rack and then applying pesticides inside the trucks from the 1970's until 1982. Subsequent investigations found that 1,2-Dichloroethane (1,2-DCA), 1,2-Dichloropropane (1,2-DCP) and benzene groundwater contamination extended under site SD-08 from an up-gradient site, Area of Concern (AOC) RR. The subject RFI Report summarizes the results of previous SD-08 site investigations (1991 through 2005), a remedial action (asphalt cap installed in 1997), an additional investigation (2006-07),

and eight quarters of long-term groundwater monitoring (2012-13), and includes a revised risk assessment. A review of the data contained in the Report confirms that site AOC-RR is the source of the volatile organic compound (VOC) groundwater contamination underlying site SD-08.

The risk assessment in the RFI Report confirms that pesticide contamination at site SD-08 has been mitigated to levels protective of human health and the environment. Therefore, the Permittee may request a Class 3 permit modification for Corrective Action Complete in accordance with 20.4.1.900 incorporating 40 C.F.R. §270.42(c). The Class 3 permit modification process includes requirements for public notice and for providing opportunity for public comment that are mandatory. NMED's preliminary determination that corrective action is complete is subject to NMED's reservation of rights for new information or unknown conditions. As part of the permit modification request (PMR) process, new information may become available during the public comment period that a given site is not protective of human health or the environment. NMED reserves all rights to withdraw its preliminary decision that corrective action is complete, if new information indicates that further corrective action is needed to protect human health or the environment.

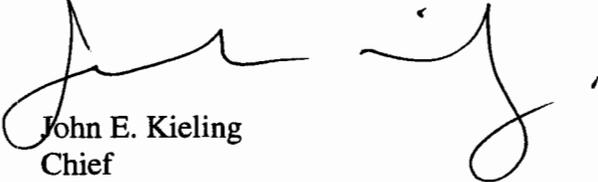
Regarding AOC-RR, it appears on Table B of the Facility's RCRA Permit, *Summary of Solid Waste Management Units and Areas of Concern with Corrective Action Complete without Controls*, with the comment that EPA called this site a SWMU in the 1988 RCRA Facility Assessment, but did not require corrective action. As new information has become available indicating that AOC-RR is the source of the VOC groundwater contamination underlying site SD-08, NMED intends to change the listing for AOC-RR from Table B of the Permit to Table A, *Summary of Solid Waste Management Units and Areas of Concern Requiring Corrective Action*. This action will be accomplished as part of the pending PMR process to grant corrective action complete status to 32 SWMUs/AOCs, proposed by the Permittee on October 4, 2015.

The Permittee must submit a RFI Work Plan (RFI WP) to investigate the source of the groundwater contamination at AOC-RR. Figure 5-2 of the *SD-08 (SWMU-82) Long Term Monitoring Report, Quarter 8, Fall 2013*, dated February 2014, shows that the VOC groundwater contaminant plume is emanating from a point identified as "AOC-RR Suspected Underground Storage Tank(s) Location". The RFI WP must propose activities that will determine if any tanks or other structures remain underground at this location and if there is a subsurface contaminant source in this area. The RFI WP must also propose activities to fully characterize the extent of the VOC contaminant plume in the groundwater and any RCRA metals contamination that may be associated with it, as well as total dissolved solids. This RFI WP must be submitted by **March 31, 2016**.

Ms. Rothaupt
January 8, 2016
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If you have any questions regarding this matter, please contact Mr. David Strasser of my staff at (505) 222-9526 or at the address in the letterhead of this correspondence.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
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