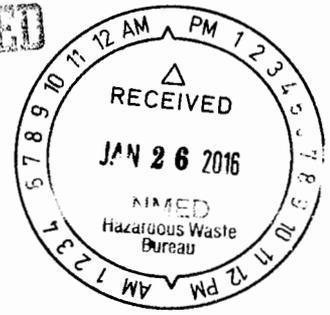




DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 49TH WING (ACC)
HOLLOMAN AIR FORCE BASE, NEW MEXICO

RECEIVED



21 January 2016

ADAM M. KUSMAK, GS-13, USAF
Chief, Installation Management Flight (49 CES/CEI)
49th Civil Engineer Squadron (49 CES)
Holloman Air Force Base, NM

USEPA, Region 6 (6PD-F)
Attn: Mr. Chuck Hendrickson, Project Manager
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Dear Mr. Hendrickson,

Holloman AFB is pleased to submit the Response to Comments document for the Final TS851a – Former Skeet Range Engineering Evaluation/Cost Analysis, Holloman Air Force Base, NM.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions regarding this submittal, please contact me at (575) 572-6675 or by email at adam.kusmak@us.af.mil.

Sincerely,

KUSMAK.ADAM.
M.1263331806

Digitally signed by KUSMAK.ADAM.M.1263331806
DN: cn=US, o=U.S. Government, ou=DoD, ou=PKI,
ou=USAF, cn=KUSMAK.ADAM.M.1263331806
Date: 2016.01.22 09:33:45 -0700

ADAM M. KUSMAK, GS-13, USAF

Attachment:

Response to Comments for the TS851a – Former Skeet Range Engineering Evaluation/Cost Analysis, Holloman Air Force Base, New Mexico.

cc:

(w/Atch)
Mr. David Strasser
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121 Tijeras Dr. NE Ste. 1000
Albuquerque NM 87109-4127

(w/Atch)
Mr. John Kieling, Chief
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Common Comment and Response Worksheet (Version 3)

Date		Surveillance Activity Number				Document Title (version)	Contract/TO Number
		SubCLIN 0063AA				Final TS851a Former Skeet Range Engineering Evaluation / Cost Analysis Holloman Air Force Base, New Mexico, June 2015	FA8903-13-C-0008
Item	Source	Section	Page	Para	Class	Comment	Response
1	NMED	General				<p>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/ TS851 a is clearly a waste that constitutes a hazard to human health and ecological receptors. Because no information has been made available to the NMED, it can only assume that the investigation proposed for TS851/S851a 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.</p> <p>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.</p> <p>With regard to MRS TS851/S851a, 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.</p>	<p>Noted. The USEPA created a guidance, Unexploded Ordnance Management Principles, in 2000 to address the cleanup of "other than operational ranges" (which were then referred to as "closed, transferred and transferring [CTT] ranges)." This remains EPA policy. In that policy document, EPA states:</p> <p>-- A process consistent with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and these management principles will be the preferred response mechanism used to address UXO at a CTT range.</p> <p>-- The legal authorities that support site-specific response actions at CTT ranges include, but are not limited to, the CERCLA, as delegated by Executive Order (E.O.) 12580 and the National Oil and Hazardous Substances Contingency Plan (NCP); the Defense Environmental Restoration Program (DERP); and the DoD Explosives Safety Board (DEESB)."</p> <p>Since the TS851 Munitions Response Site (MRS) has been addressed under the U.S. Air Force Military Munitions Response Program (MMRP) created by Congress in 2001 under the DERP as established by Section 211 of the Superfund Amendments and Reauthorization Act (SARA) of 1986 the site is subject to regulation under the MMRP CERCLA cleanup process. Based on information provided above, no revisions of the WP are required.</p> <p>A CSE Phase II was conducted at the site and following the EE/CA, an Action Memo and NTCRA Work Plan will follow prior to any remedial action and/or treatment. The Work Plan will include proposed actions including but not limited to excavation boundaries and locations for confirmation soil sampling. The Work Plan will indicate that actual excavation boundaries will be determined by confirmation samples and over-excavation may occur pending results. The CSE Phase II field activities included collecting soil samples using USEPA approved methodology (SW846 3050/6010 which specifies removal of particles larger than 2mm and any foreign objects such as sticks, leaves, and rocks etc.). Including fragments of lead shot in samples would only verify that shot consists of lead. The objective of the CSE Phase II was to analyze potential impacts to soil from lead shot and clay target debris. The results did not indicate unacceptable risk from lead in soil. All lead sampling data including point specific lead results are presented in the Final CSE Phase II Report (September 2013) including laboratory and XRF correlation data. The results from correlation data presented in Section 5.21 of the CSE Phase II report indicated a correlation coefficient of 0.99, concluding that the XRF data are considered to be definitive and can be used in the risk assessment and for remedial decision-making. As the CSE Phase II indicated, lead is not a soil contaminant of concern.</p>
2	NMED	General				<p>The Permittee shall submit the RI WP and investigation report for MRS TS851/TS851 a to NMED on or before December 4, 2015 in the form of two paper copies and one electronic copy (in MS Word/ Excel™ format).</p>	<p>Noted. Please see response to Comment #1. A NTCRA Work Plan will be developed prior to soil removal activities that will indicate pre-excavation soil sample locations, and post-excavation confirmatory soil sample analyses along with proposed excavation boundaries.</p>

- Column A: Comment Identifier Number
- Column B: Source (Commenter/Authority)
- Column C: Section Number of Comment
- Column D: Page Number of Comment (first page associated with comment)
- Column E: Paragraph number, on page, of Comment Line Number (within Paragraph above) of Comment
- Column F: Comment
- Column G: Comment Classification
- Column H: Comment
- Column I: Response
- Notes: Comments must be actionable ("add the following text:...", "delete...", "change text to:")
Place only one comment per row.
Classify comment as C, M, S, or A.

Comment Classifications
<p>(C) Critical: Critical comments will result in a critical issue. Provide convincing support.</p> <p>(M) Major: Major comments are significant concerns that may result in a major issue. This category may be used with a general statement of concern followed by a detailed comment on the specific entries in the document that, considered in total, constitute the concern.</p> <p>(S) Substantive: An entry in the document that appears to be or is potentially unnecessary, misleading, incorrect, or confusing.</p> <p>(A) Administrative: Administrative comments correct inconsistencies between different sections, typographical and grammatical errors.</p>