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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 22, 2016

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

**RE: PARTIAL APPROVAL
ACCELERATED CORRECTIVE MEASURES COMPLETION REPORT, SITES
OT-32 AND RW-42, SEPTEMBER 2012
HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422
HWB-HAFB-12-017**

Dear Ms. Rothhaupt:

On September 18, 2014 the New Mexico Environment Department (NMED) issued a Notice of Disapproval (NOD) to Holloman Air Force Base (the Permittee) for the Accelerated Corrective Measures Completion Report (the ACM Report) for sites OT-32 (Area of Concern [AOC] PRI-A) and RW-42 (Solid Waste Management Unit [SWMU] 111), dated September 2012. The NOD addressed deficient issues at both OT-32 and RW-42. Since the issuance of the NOD, the Permittee has elected to separate the reporting of the remedial actions at these sites.

On December 5, 2014 and March 3, 2015 the NMED approved the Permittee's proposals for additional site monitoring and reporting activities at site OT-32 and stipulated that a separate work plan for investigative activities at site RW-42 be submitted. In a letter dated October 13, 2015 the NMED approved a request for an extension of the deadline to submit the report for site OT-32 and the work plan for site RW-42 until November 25, 2015. The Permittee submitted the *Letter Report for OT-32* (Letter Report), dated November 2, 2015, addressing the additional site monitoring activities required by NMED. However, the required work plan for site RW-42 has not been submitted to date. Therefore, this letter provides a partial approval of the ACM Report as only site OT-32 has been satisfactorily addressed.

Regarding site OT-32, the rationale for the September 18, 2014 NOD was based upon the detection of 1,1-dichloroethene (1,1-DCE) in monitoring well OT32-TMW09 (TMW09) at 18 micrograms per liter ($\mu\text{g/L}$) in 2007, that exceeded the New Mexico Water Quality Control Commission (NMWQCC) ground water standard of 5 $\mu\text{g/L}$ and the questionable ground water flow direction as depicted in the ACM Report. The NOD required that the Permittee conduct two additional quarters of ground water sampling from TMW09 for volatile organic compounds (VOCs) and total dissolved solids and that the potentiometric surface map of the site be revised based upon additional ground water level measurements. The NOD further stated that the NMED would make a decision regarding the need for further site characterization upon review of the results.

The November 2, 2015 Letter Report provides the results of ground water sampling conducted in October 2014 and July 2015. In addition to samples being collected from TMW09, samples were collected from wells TMW08 and TMW10, located approximately 200 feet upgradient and downgradient of TMW09, for VOCs. This sampling confirmed that elevated levels of 1,1-DCE are limited to TMW09. Potentiometric surface data collected during this period confirmed the direction of ground water flow. The analytical results from 2014 and 2015 indicate that 1,1-DCE was still present in TMW09 at 12 $\mu\text{g/L}$ and 7.5 $\mu\text{g/L}$, respectively. This shows that the concentration of 1,1-DCE has decreased by approximately 58 percent since 2007. In the July 2007 sampling event for TMW09, the total dissolved solids (TDS) concentration in ground water was 13,000 milligrams per liter (mg/L) and in the July 2015 sampling event it was 14,000 mg/L . This is greater than the NMWQCC threshold for potable water (10,000 mg/L) and thus, the ground water is designated as unfit for human consumption. NMED notes that, as per 20.6.2.3101 NM Administrative Code, the NMWQCC standards for maximum allowable concentrations of contaminants are to be applied to ground water with TDS at a concentration of 10,000 mg/L or less.

Based on these data, NMED finds that the extent of 1,1-DCE is localized, attenuating, and approaching the relevant NMWQCC standard. Although 1,1-DCE was detected above NMWQCC standards in TMW09, the elevated TDS concentration indicates that the underlying ground water is not a potential water supply. In addition, site OT-32 is located in a remote, vacant portion of the facility with no pathway for VOC vapor inhalation. Therefore, the NMED finds that site OT-32 (AOC-PRI-A) is suitable for a finding of Corrective Action Complete.

The Permittee may request a Class 3 permit modification for Corrective Action Complete for AOC-PRI-A in accordance with 40 C.F.R. §270.42(c). The Class 3 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 this 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.

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It should be noted that AOC-PRI-A, the Primate Research Lab Sewer Line, is incorrectly listed on Table B of Permit Appendix IV-A, *Summary of Solid Waste Management Units and Areas of Concern With Corrective Action Complete Without Controls*, with the comment that "EPA listed the site in 1988 as a SWMU with no further action required". It is apparent that the EPA had no knowledge of the 1,1-DCE ground water contamination in monitoring well TWW09 in 1988. Upon approval of the Class 3 permit modification, this AOC will remain on the aforementioned Table B. Should the permit modification request be denied, this AOC will be moved to Table A of Permit Appendix IV-A, *Summary of Solid Waste Management Units and Areas of Concern Requiring Corrective Action*.

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
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File: HAFB 2016 and Reading
HAFB-12-017