



SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

**2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.env.nm.gov**



RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 18, 2016

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

**RE: DISAPPROVAL
FINAL REMEDIAL INVESTIGATION WORK PLAN, ML866 FORMER
BOMBING RANGE MUNITIONS RESPONSE SITE (MRS) AND SR867
POSSIBLE FIRING RANGE MRS, NOVEMBER 2015
HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422
HWB-HAFB-15-017**

Dear Ms. Rothhaupt:

The New Mexico Environment Department (NMED) has reviewed the above referenced document submitted by Holloman Air Force Base (the Permittee) on November 13, 2015. NMED finds that the subject document is deficient and hereby issues this Disapproval for the reasons discussed below.

1. Figure 1-1 shows that munitions response site (MRS) ML866 abuts the facility's western boundary with the White Sands Missile Range for approximately three miles. The Permittee is advised that if results of this investigation confirm environmental concerns at this site, the remainder of the range offsite to the west of the boundary may need to be investigated.
2. The stated presence of abundant .50-caliber projectiles indicates that MRS SR867 is potentially a solid waste management unit or area of concern under the facility's Hazardous Waste Operating Permit. Upon completion of the investigation, the Permittee shall specify the composition(s) of the projectiles and provide an estimate of the total volume of the projectiles abandoned at the site.

3. Several sections of the work plan indicate that munitions constituent sampling will be conducted using composite sampling techniques for explosives and metals at confirmed locations of munitions and explosives of concern (MEC) as well as composite sampling for explosives, anions and perchlorate at isolated locations where evidence of potential propellant contamination (e.g., discolored soil) is observed. NMED does not accept composite sampling as part of site characterization for compliance purposes. The Permittee shall collect discrete samples for the constituents specified in the work plan at confirmed locations of MEC and at isolated locations showing evidence of potential propellant contamination (e.g., discolored soil). The Permittee may propose to conduct multi-incremental sampling as a screening tool to identify areas where contamination is present to aid in the selection of discrete sample locations.

The Permittee shall submit a revised work plan incorporating the above revision.

4. Several sections of the work plan state that if soil sampling results indicate the potential for contaminant migration into groundwater (i.e. leachability) then groundwater samples will be collected at the specific source location for the identified contaminant of concern. However, the protocol to be used to assess the potential for contaminant migration to groundwater is not provided.

The Permittee shall submit a revised work plan indicating how the potential for contaminant migration to groundwater will be assessed.

5. Several sections of the work plan state that "... if intrusive investigation results in these areas show that the subsurface DGM anomalies are non-munitions related, then no incremental sampling will be conducted." The Permittee shall investigate all suspect subsurface DGM anomalies and, whether they are munitions related or not, shall conduct sampling if the anomaly is suspected of being a potential source of soil contamination (e.g., finding buried drums).

The Permittee shall submit a revised work plan incorporating the above revision.

The Permittee shall submit the revised work plan to NMED on or before **June 17, 2016** in the form of two paper copies and one electronic copy (in MS Word/ Excel™ format).

Ms. Rothaupt
April 18, 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.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kieling". The signature is fluid and cursive, with a large initial "J" and a long horizontal stroke.

John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
C. Amindyas, NMED HWB
D. Strasser, NMED HWB
C. Hendrickson, EPA-Region 6 (6PD-F)
L. King, EPA-Region 6 (6PD-N)

File: HAFB 2016 and Reading
HAFB-15-017