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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 26, 2016

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

**RE: RESPONSE TO COMMENTS, JANUARY 21, 2016
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 January 26, 2016, the New Mexico Environment Department (NMED) received a document from Holloman AFB (the Permittee) responding to NMED's September 4, 2015 comments on the *TS851a – Former Skeet Range, Engineering Evaluation/Cost Analysis (EE/CA)*, which was submitted on July 13, 2015. The Permittee has previously been advised that NMED has not received an Investigation Work Plan (IWP) for site TS851a/TS851 to review and cannot meaningfully review the EE/CA without first approving an IWP for the site. 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 Operating Permit (the Permit). The clay target debris and lead shot occurring throughout site TS851a/ TS851 are clearly wastes that constitute a hazard to human health and ecological receptors. This site will be added to the list of Solid Waste Management Units/Areas of Concern (SWMU/AOCs) in the Permit that identifies SWMUs/AOCs Requiring Correction Action (i.e., Table A of Permit Part 4, Appendix 4-A)

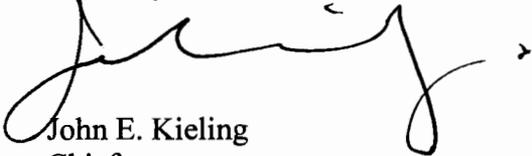
NMED's September 4, 2015 letter indicated that, as an alternative to extensive area-wide sampling and analysis and assessment of risk, NMED preferred that the Permittee propose a pre-

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sumptive remedy to conduct remediation of soil to remove hazardous waste and hazardous constituents, followed by post-excavation confirmatory sampling. The Response to Comments states that a Non-time Critical Removal Action Work Plan (NTCRA WP) will be developed prior to soil removal activities that will propose pre-excavation soil sample locations, and post-excavation confirmatory soil sample analyses along with proposed excavation boundaries. However, a submittal date was not provided. The Permittee needs to submit the NTCRA WP to NMED on or before **June 27, 2016** in the form of two paper copies and one electronic copy (in MS Word/ Excel™ format) for review.

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

File: HAFB 2016 and Reading
HAFB-13-023