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NEW MEXICO ENVIRONMENT DEPARTMENT

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RYAN FLYNN Cabinet Secretary BUTCH TONGATE Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 28, 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 SR859a FORMER SKEET RANGE 2 AND TS862a JEEP TARGET AREA SKEET RANGE, REMEDIAL INVESTIGATION WORK PLAN, FEBRUARY 2015 HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422 HWB-HAFB-14-007

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 August 27, 2015 comments on the above referenced Remedial Investigation Work Plan (RI WP), which was submitted on February 25, 2015. 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 sites SR859a/TS862a are clearly wastes that constitute a hazard to human health and ecological receptors. These sites 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 August 27, 2015 letter indicated that, as an alternative to extensive area-wide sampling

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and analysis and assessment of risk, NMED preferred that the Permittee propose a presumptive remedy to conduct remediation of soil to remove hazardous waste, 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 indicate 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/ ExcelTM format).

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-14-007