



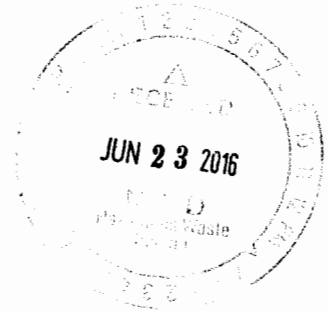
DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 49TH WING (ACC)
HOLLOMAN AIR FORCE BASE, NEW MEXICO



22 June 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

Mr. John E. Kieling
Chief, Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East Bldg. 1
Santa Fe NM 87505-6063



Dear Mr. Kieling,

Holloman AFB is pleased to submit the Responses to Comments document regarding the NMED disapproval dated April 18, 2016 of the Remedial Investigation Work Plan for the ML866 Former Bombing Range and SR867 Possible Firing Range Munitions Response Sites, 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,

Digitally signed by
KUSMAK.ADAM.M.1263331806
DN: c=US, o=U.S. Government, ou=DoD,
ou=PKI, ou=USAF,
cn=KUSMAK.ADAM.M.1263331806
Date: 2016.06.22 11:07:47 -06'00'

ADAM M. KUSMAK, GS-13, USAF

Attachment:

Responses to Comments - Remedial Investigation Work Plan for the ML866 Former Bombing Range and SR867 Possible Firing Range MRSs, Holloman Air Force Base, New Mexico.

cc:

(w/Atch)	(w/CD)	(w/o Atch)
Mr. David Strasser	Mr. Chuck Hendrickson	Mr. Cornelius Amindyas
Hazardous Waste Bureau	U.S. Environmental Protection Agency	Hazardous Waste Bureau
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Common Comment and Response Worksheet (Version 3)

							Document Title (version) RI Work Plan ML866 and SR867 MRSs Holloman AFB, NM	Contract/TO Number/ FA8903-13-C-0008	
Item	Source	Section	Page	Para	Line	Class	Comment	Response	NMED Concurrence
1	NMED John E. Kieling Chief Hazardous Waste Bureau	Figure 1-1					Figure 1-1 shows that munitions response site (MRS) ML866 abuts the facility's western boundary with 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.	Agreed. The Final RI WP submitted to both EPA and NMED on May 20, 2016 already includes the revision of the text based on the similar EPA comment dated March 10, 2016 (comment # 1; note the responses to EPA comments were also submitted to NMED on May 20). The revision was made to the second sentence in Section 3.4.2 which in the Final RI WP reads: " <u>If perimeter anomalies are found or if surface clearance and/or intrusive investigation results indicate the presence of MEC/MPPEH beyond the MRS boundaries, FPM will extend surface clearance, DGM, and intrusive investigation of anomalies to determine the nature and extent of contamination.</u> " No additional changes to the WP were required.	
2	NMED John E. Kieling Chief Hazardous Waste Bureau	General					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.	<p>Comment noted. The potential contamination of soil at SR867 due to presence of .50 caliber projectiles was addressed during the previous investigation of the site, Comprehensive Site Evaluation (CSE) Phase II, performed in 2012. Although the contaminants of potential concern (COPC) for projectiles include in addition to lead, copper, zinc, and arsenic, the primary COPC at small arms/firing ranges is lead. As a result, 71 surface soil samples were collected at SR867 during the CSE Phase II and analyzed for lead using XRF. Of the 71 samples analyzed, 69 returned lead concentrations below Level of Detection. The two detected concentrations, 13 and 17 mg/kg, were well below the NMED/EPA residential human health screening level of 400 mg/kg.</p> <p>In addition, at the conclusion of the XRF sampling at MMRP sites during the CSE Phase II, twelve correlation samples were selected and sent to the analytical laboratory to determine whether XRF results can be considered definitive and can be used for decision making purposes. The results of the linear regression analysis for Holloman AFB yield a correlation coefficient of 0.99, indicating that the XRF data may be considered to be definitive and as a result may be used for remedial decision-making. Therefore, XRF analysis have shown that lead was not a concern for human health or the environment at the SR867 MRS. However, for MEC at SR867, further munitions response action was recommended at the conclusion of the CSE Phase II based only on MD items identified at the site (5-inch rocket motors, rocket motor venture plates, and tail fins), indicating the potential for the presence of subsurface MEC.</p> <p>Therefore, based on the CSE Phase II results, this site is primarily considered a MEC site, and as such is being 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 and is codified in Sections 2701-2710 of Title 10 of the United States Code (U.S.C.).</p> <p>Please note the RI field work at ML866 and SR867 MRSs was completed between April 11 and May 20, 2016. FPM team recorded the locations of .50 caliber projectiles along Digital Geophysical Mapping (DGM) transects and grids as requested by NMED, and the rough estimate of projectile density at this site based on RI results is 25 projectiles per acre. The distribution of identified projectiles will be provided in the RI Report currently under preparation.</p>	

3	NMED John E. Kieling Chief Hazardous Waste Bureau	General				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.	<p>Comment noted. Both ML866 and SR867 Munitions Response Sites (MRSs) have been addressed under the U.S. Air Force MMRP as described in the response to comment # 2 (third paragraph). As a result, Munitions Constituents (MC) sampling methodology (i.e., incremental and composite sampling [a seven-point “spoke and hub” method]) described in the submitted RI WP is in accordance with U.S Army Corps of Engineers Technical Guidance for Military Munitions Response Action EM 200-1-15 (2015). The methods described in the WP for laboratory analysis of incremental and composite samples include EPA SW-846 Methods 8330A and 8330B for explosives and Method 6010C for metals both of which are in compliance with EM 200-1-15 guidance.</p> <p>As stated in the response to comment # 2, the RI fieldwork at ML866 and SR867 MRSs has been completed, and since no source (surface or subsurface) for potential MC or propellant contamination was found at either of the two MRSs (i.e., Munitions and Explosives of Concern [MEC], significant amounts of Munitions Debris [MD], and discolored soil), no MC sampling (composite or incremental) was performed during the RI.</p> <p>Based on information provided above, no revisions of the WP are required.</p>	
4	NMED John E. Kieling Chief Hazardous Waste Bureau	General				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.	<p>Comment noted. Based on information available during the preparation of the WP and past experience at similar sites, the likelihood of groundwater contamination due to site activities was considered low. As a result, the WP deferred specifying a protocol for assessing the potential for contaminant migration to groundwater until soil contamination was confirmed.</p> <p>In addition, as stated above in the response to comment #3, FPM completed the fieldwork at both MRSs, and soil sampling (surface or subsurface) was not performed since no source for MC or propellant contamination was identified. As a result, there is no potential for contamination of groundwater at either of the two MRSs.</p> <p>Based on information provided above, no revisions of the WP are required.</p>	
5	NMED John E. Kieling Chief Hazardous Waste Bureau	General				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.	<p>Comment noted. FPM Team intrusively investigated all DGM anomalies above the site specific thresholds during the RI. No MEC, significant amounts of MD, or buried drums were discovered during these activities, and as a result, no MC or environmental soil sampling was performed during the RI at either of the two MRSs. Detailed results of intrusive investigation activities and results will be provided in the RI Report currently under preparation.</p> <p>Based on information provided above, no revisions of the WP are required.</p>	