



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

August 19, 2016

Adam Kusmak, Chief
Installation Management Flight
49th CES/CEI
550 Tabosa Avenue
Holloman AFB, NM 88330

**RE: APPROVAL WITH MODIFICATIONS
DATA GAP INVESTIGATION REPORT, T-38 TEST CELL FUEL SPILL SITE
SS059/SS524 (SWMU 229); SWMU 229 GROUNDWATER MONITORING AND
LNAPL RECOVERY ASSESSMENT WORK PLAN, HOLLOMAN AIR FORCE
BASE, JUNE 2016
HOLLOMAN AIR FORCE BASE, EPA ID# NM6572124422
HWB-HAFB-16-013**

Dear Mr. Kusmak:

The New Mexico Environment Department (NMED) has reviewed the Holloman Air Force Base (Permittee) document: *Data Gap Investigation Report, T-38 Test Cell Fuel Spill Site SS059/SS524 (SWMU229); SWMU 229 Groundwater Monitoring and LNAPL Recovery Assessment Work Plan, Holloman Air Force Base, New Mexico, June 2016*, which was received on June 23, 2016. The Investigation Report (IR) is hereby approved; however, the work plan included with the IR is not approved.

A work plan to evaluate light nonaqueous phase liquids (LNAPL) recovery, installation of wells and groundwater monitoring was included as Appendix G in the IR. Submittal of a work plan as part of an investigation report is not appropriate and can complicate approval of a document and also create document tracking difficulties. Therefore, the Permittee must submit a separate work plan that provides the details of proposed work and includes background information and the rationale for the proposed work.

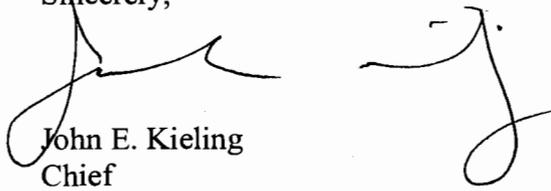
Mr. Kusmak
August 19, 2016
Page 2

The work plan must include descriptions of site surface and subsurface conditions and all proposed work in detail sufficient for the reader to understand the scope of proposed work and the methods that will be used to complete the work including all proposed testing and data collection methods and management of investigation-derived waste. The descriptions must be adequate to allow the reader to evaluate the basis for the proposed work and whether the proposed methods will generate valid and defensible data. In addition, the work plan must include a proposed schedule for implementation of the plan and proposed dates for submittal of separate reports summarizing the results of the pilot tests and the results of periodic groundwater monitoring.

Holloman Air Force Base propose additional work to evaluate alternate methods for recovery of the remaining LNAPL at the site. The presence of LNAPL at the site will preclude the change in Permit status from a site requiring corrective action to one with corrective action complete. The work plan discussed above must be submitted to NMED no later than **October 31, 2016**.

If you have any questions regarding this letter, please contact Mr. Brian Salem of my staff at (505) 222-9576.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
B. Salem, NMED HWB
C. Amindyas, NMED HWB
D. Strasser, NMED HWB
C. Schick, HAFB
D. Griffin, HAFB
C. Hendrickson, EPA Region 6 (6MM-RC)
L. King, EPA Region 6 (6PD-F)

File: HAFB 2016 and Reading
HWB-HAFB-16-013