



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



3 October 2016

ADAM M. KUSMAK, GS-13, USAF
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Mr. Chuck Hendrickson, Project Manager
RCRA Corrective Action Section (6MM-RC)
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Dear Mr. Hendrickson,

Holloman AFB is pleased to submit Responses to USEPA Comments dated August 5, 2016 on the Remedial Investigation Report for the SR859a Former Skeet Range 2 and TS862a Jeep Target Area Skeet Range Munitions Response Sites.

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: cn=US, ou=U.S. Government, ou=DoD, ou=PA,
ou=USAF, cn=KUSMAK ADAM M.1263331806
Date: 2016.10.03 12:39:02 -0600

ADAM M. KUSMAK, GS-13, USAF

Attachment(s): Response to USEPA Comments on *SR859a Former Skeet Range 2 and TS862a Jeep Target Area Skeet Range Remedial Investigation Report*.

cc:

(w/Atch)

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(w/Atch)

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Common Comment and Response Worksheet (Version 3)

Date		Surveillance Activity Number					Document Title (version)	Contract/TO Number
8/16/2016							RI report SR859a and TS862a Holloman AFB	FA8903-13-C-0008
Item	Source	Section	Page	Para	Line	Class	Comment	Response
1	USEPA						The Work Plan for this RI was written and executed without corrections responsive to EPA's November 26, 2014 letter (attached) which non-concurred with HAFB's May 2014 RI Work Plan. Unresolved issues involve sampling methods, lead (Pb) shot, clay target debris, and relevance of the NMED RCRA permit. These issues affect the whole of these ranges, not just the SR859a and TS862a sub-sites. Due to these unresolved issues I non-concur with this report and continue to non-concur with the work done at these sites.	<p>Noted. The responses to EPA comments dated November 26, 2014 regarding the RI WP were provided on January 16, 2015 with confirmation of delivery on January 20, 2015. As stated in the RTCs, the SR859 and TS862 MRAs were investigated during the CSE Phase II, and although lead shot and clay target debris were found throughout the MRAs, results from the soil samples collected using EPA approved methodology (SW846 3050/6010 which specifies removal of particles larger than 2mm and any foreign objects such as sticks, leaves, and rocks) did not indicate unacceptable risk from concentrations of contaminants in soils for portions of the MRAs identified as SR859 and TS862 MRs. However, the remaining portions of two MRAs, SR859a and TS862a MRs, were recommended for further munitions response action at the conclusion of the CSE Phase II due to PAH concentrations in soil exceeding the screening levels.</p> <p>Two MRs, SR859a and TS862a containing lead shot and clay target debris within the entire MRS boundaries will be subject to the presumptive remedy of soil excavation during the follow-on Non-Time Critical Removal Action (NTCRA). The EPA's concern regarding the potential contamination of these two sites due to presence of clay target debris and lead shot will be addressed during the NTCRA by removing any clay target debris and lead shot (with soil being excavated) and by disposing it of offsite.</p> <p>Please note that both SR859a and TS862a MRs are planned for the inclusion on the Holloman AFB RCRA Permit and that the NMED approved the path forward for both MRs by requesting the submission of the NTCRA WP by June 27, 2017 (NMED letters dated April 26, 2016 and August 2, 2016).</p>
2	USEPA	5.3.1.3					Potential Receptors: Please explain how the soil samples taken over the 0-18" depth interval are representative of exposures to the potential receptors considered in Section 5.	<p>Noted. Since the purpose of the RI was to determine the nature and extent of contamination, the RI soil samples were collected over the 0-18" depth interval to vertically delineate the previously identified (CSE Phase II) contamination. Based on RI results, the anticipated remedy for both sites includes excavation of all soils and debris to approximately 18-inches below ground surface. However, if end-point (confirmatory) sampling indicates that PAH and lead concentrations are still above their respective screening levels, additional soil excavation will be performed until concentrations of all contaminants of concern are below their respective screening levels.</p>
3	USEPA	5.5					<p>Pathway Analysis: "Contaminated soils at each site are the result of direct deposition of skeet range related debris." "Migrations of metals such as lead, and PAH compounds in site soils are controlled by the solubility of different mineralogical phases and their adsorption to soil and organic materials." "Lead from shotgun shells exists as metallic lead or as lead antimony alloy, both of which have low solubility and is likely to remain in this particle form near the soil surface. Most PAH also have low solubility in water and tend to bind to organic carbon in soil and therefore if migration were to occur in the environment it is due to particle bound materials." Clearly the presence of lead shot and PAH-containing skeet target debris has been recognized, and mapped on Figures 4, 6, 7, 9, 10, and 11. What continue to be unrecognized in this report are the risks presented by the shot and debris themselves. The pathway analysis charts on Figures 12 and 13 fail to include the contaminant source that is the range debris. There are present risks from exposure to this waste range debris as well as the risks of future spread of contaminants from the debris to soil and other media. Since this project has not, to date, sampled the debris itself, a proper risk evaluation cannot be made. The further action proposed by this report addresses only PAH contamination in soil, it does not mention any plans to remove the debris which has been causing the soil PAH contamination.</p>	<p>Noted. Concentrations of PAHs in soils have been detected at levels exceeding USEPA and NMED screening levels at both SR859a and TS862a MRs. These exceedances are the driver for the continuation of the site through remedial action (i.e. soil excavation) to reach the site closeout. During previous sampling investigations throughout the entire MRAs, it was determined that lead concentrations in soil samples were below the USEPA RSLs. Sampling of the clay target debris itself will not add any benefit, as it is accepted that the clay target debris has led to the PAH soil contamination within the MRS boundary. The further action proposed in the report (the follow-on NTCRA) will address the soil PAH contamination as well as the presence of clay target debris and lead shot, because soil excavation will remove soils (including clay target debris and any residual lead shot or foreign objects) from the surface to approximately 18 inches below ground surface. Clay target debris and all other range related debris will not be sorted separately but will be excavated and disposed of with the soil.</p> <p>Any concern of a source remaining after the presumptive remedy will be addressed by additional soil removal. Endpoint confirmation samples will also be collected to ensure PAH concentrations are below project action levels.</p>

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Item	Source	Section	Page	Para	Line	Class	Comment		Response	
Column A:	Comment Identifier Number					Comment Classifications				
Column B:	Source (Commenter/Authority)					(C) Critical: Critical comments will result in a critical issue. Provide convincing support.				
Column C:	Section Number of Comment					(M) Major: Major comments are significant concerns that may result in a major issue. This category may be used with a general statement of concern followed by a detailed comment on the specific entries in the document that, considered in total, constitute the concern.				
Column D:	Page Number of Comment (first page associated with comment)					(S) Substantive: An entry in the document that appears to be or is potentially unnecessary, misleading, incorrect, or confusing.				
Column E:	Paragraph number, on page, of Comment					(A) Administrative: Administrative comments correct inconsistencies between different sections, typographical and grammatical errors.				
Column F:	Line Number (within Paragraph above) of									
Column G:	Comment Classification									
Column H:	Comment									
Column I:	Response									
Notes:	Comments must be actionable ("add the following text:...", "delete...", "change text to:") Place only one comment per row. Classify comment as C, M, S, or A.									