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NEW MEXICO
ENVIRONMENT DEPARTMENT



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Acting Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 18, 2016

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

**RE: DISAPPROVAL
FINAL RESOURCE CONSERVATION AND RECOVERY ACT FACILITY
INVESTIGATION WORK PLAN, SS-074 AND TU-912, APRIL 2016
HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422
HWB-HAFB-16-009**

Dear Mr. Kusmak:

The New Mexico Environment Department (NMED) has reviewed the above referenced document (the Work Plan) submitted by Holloman Air Force Base (the Permittee) on May 5, 2016. NMED hereby issues this Disapproval with the following comments.

Comment 1

Provide a figure that depicts the main base area with the locations of SS-074 and TU-912 clearly marked.

Comment 2

The *SWMU Assessment Report* for site TU-912 (the Building 301 Concrete UST), received by the NMED on November 20, 2013, states that “[p]reliminary coring indicated that soil contamination extends as much as 100 meters from the tank”. The Work Plan makes no mention of this possibility. Provide information to document whether or not this assertion is valid and, if so, how this extended area will be characterized.

Comment 3

The Work Plan states in several locations that “up to 100 cubic yards of impacted soil may require removal from each site for off-site disposal.” Provide a discussion about what will occur should the investigations reveal that more than 100 cubic yards of soil must be removed from one or both of the sites.

Comment 4

Section 1.2 of the Work Plan states that comparisons with soil and groundwater screening levels will be conducted in accordance with the NMED guidance document *Risk Assessment Guidance for Site Investigations and Remediation*, dated December 2014. The Permittee shall utilize the July 2015 version of this document, as updated.

Comment 5

Section 3.4.2 of the Work Plan, Soil Analytical Testing, indicates that soil samples will be analyzed for “RCRA Metals.” Given that the sources of the contamination are essentially unknown, the Permittee must analyze the soil for Target Analyte List (TAL) Metals and add polychlorinated biphenyls (PCBs) to the analytical suite.

Comment 6

Section 3.5.10 of the Work Plan, Groundwater Analytical Testing, indicates that groundwater samples will also be analyzed for “RCRA Metals”. The Permittee shall analyze all groundwater samples for TAL Metals and add Total Dissolved Solids and PCBs to the list of analytes.

Comment 7

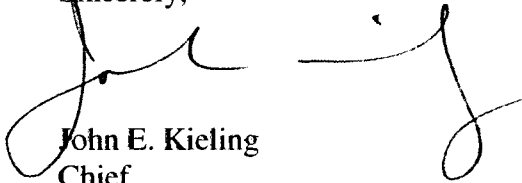
Section 5.3 of the Work Plan, Annual Groundwater Monitoring Reports, states that “[b]rief summaries of the analytical results of quarterly monitoring will be prepared quarterly”. This is the first mention of conducting quarterly groundwater monitoring at these sites made in the Work Plan. Provide a separate groundwater monitoring plan that describes the details of the proposed quarterly groundwater monitoring and sampling.

The Permittee must submit a revised Work Plan that addressed the comments included in this Disapproval to NMED no later than **February 28, 2017**. The submittal must include a response letter that identifies where the changes have been made to the Work Plan. In addition, the Permittee must submit the groundwater monitoring work plan referenced in Comment 7 above no later than **January 31, 2017**.

Mr. Adam Kusmak
November 18, 2016
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If you have any questions regarding this letter, please contact Mr. David Strasser of my staff at (505) 222-9526.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kieling". The signature is fluid and cursive, with a large initial "J" and a long horizontal stroke.

John E. Kieling
Chief
Hazardous Waste Bureau

cc: **D. Cobrain, 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 (6MM-RC)

File: **HAFB 2016 and Reading**
HAFB-16-009