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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 6, 2016

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

**RE: DISAPPROVAL
FINAL SS-002 - SUPPLEMENTAL RESOURCE CONSERVATION AND
RECOVERY ACT FACILITY INVESTIGATION WORK PLAN, APRIL 2016
HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422
HWB-HAFB-16-004**

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 April 20, 2016. NMED hereby issues this Disapproval with the following comments.

Comment 1

It appears that Figure 1-2 of the Work Plan depicts monitoring well MW-02&05-04 in the wrong location when compared to its location on Figure 1-3. In addition, Figure 1-2 does not present the New Mexico State Plane coordinates, as required. Revise the figures accordingly.

Comment 2

Since 1,2-dichloroethane (EDC) was detected in groundwater during previous groundwater monitoring events and releases occurred at the site from the early 1960s to the late 1970s, the Permittee shall analyze all groundwater samples during the first year of semi-annual

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monitoring for 1,2-dibromoethane (EDB) using EPA Method 8011, in addition to the other chemical analyses proposed in the Work Plan and the accompanying Ground Water Monitoring Plan (GWMP). The minimum detection limit for EDB shall not exceed 0.0001 milligrams per liter. Revise the Work Plan to propose analysis for EDB.

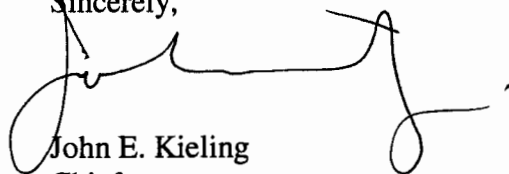
Comment 3

The Work Plan does not propose any groundwater monitoring in the vicinity of the former locations of temporary monitoring wells DP-20 through DP-24, as shown on Figure 1-3. As these wells have historically had the highest concentrations of benzene and EDC at the site, the Permittee shall propose the installation and sampling of a minimum of two additional monitoring wells that will accurately define the extent of groundwater contaminants in the vicinity of these former wells. Chemical analyses of all groundwater samples shall be conducted as proposed in the GWMP, plus EDB (as revised).

The Permittee must submit a revised Work Plan that addresses the comments included in this Disapproval to NMED no later than **February 3, 2017**. The submittal must include a response letter that identifies where the changes have been made to the Work Plan and an electronic redline-strikeout version of the revised Work Plan showing where all changes have been made to the plan.

If you have any questions regarding this letter, 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. Schick, HAFB
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File: HAFB 2016 and Reading
HAFB-16-004