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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: DISSAPPROVAL
SS-002 – PETROLEUM, OIL AND LUBRICANTS STORAGE TANK SPILL SITE
1, FINAL GROUNDWATER MONITORING PLAN, APRIL 2016
HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422
HWB-HAFB-16-005**

Dear Mr. Kusmak:

The New Mexico Environment Department (NMED) has reviewed the above referenced document (the Groundwater Monitoring Plan [GWMP]) submitted by Holloman Air Force Base (the Permittee) on April 20, 2016. NMED issues this Disapproval with the following comments.

Comment 1

Figure 2-1 is the only figure presented in the GWMP that shows site conditions. The figure does not depict the historical benzene and 1,2-dichloroethane (EDC) groundwater contamination results or distribution plumes nor the former locations of temporary monitoring wells DP-20 through DP-24, as shown on Figure 1-3 of the accompanying RCRA Facility Investigation Work Plan (RFI WP). It is important to depict the temporary wells because they have the highest historical concentrations of benzene and EDC at the site. Also, it appears that monitoring well MW-02&05-04 is shown in the wrong location, when compared to its location on Figure 1-3 of the RFI WP. In addition, Figure 2-1 does not present the New Mexico State Plane coordinates nor the groundwater flow direction, as required. Revise the GWMP accordingly.

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Comment 2

Since EDC was detected in groundwater during previous groundwater monitoring events and releases occurred at the site from the early 1960s to the late 1970s, all groundwater samples must be analyzed for 1,2-dibromoethane (EDB) using EPA Method 8011 during the first year of semi-annual groundwater monitoring, in addition to the other chemical analyses proposed in the GWMP. The minimum detection limit for EDB shall not exceed 0.0001 milligrams per liter. Revise the GWMP to propose analysis of all groundwater samples for EDB.

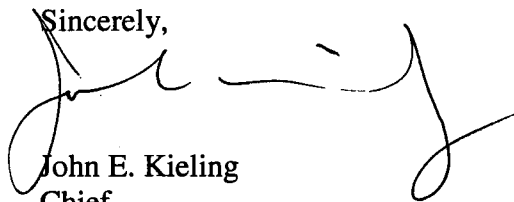
Comment 3

The GWMP 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 of the RFI WP. As required in the December 6, 2016 Notice of Disapproval for the RFI WP, the Permittee is required to install and sample 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.

The Permittee must submit a revised GWMP that addresses the comments included in this Disapproval to NMED no later than **February 10, 2017**. The submittal must include a response letter that identifies where the changes have been made to the GWMP and an electronic redline-strikeout version of the plan that highlights where all changes have been made to the document.

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
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HAFB-16-005