



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](http://www.env.nm.gov)

BUTCH TONGATE  
Cabinet Secretary-Designate

J.C. BORREGO  
Deputy Secretary

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

December 30, 2016

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

**RE: DISAPPROVAL  
FINAL SUPPLEMENTAL RCRA FACILITY INVESTIGATION WORK PLAN,  
SITES: TU521 (SWMUs 122 AND 123) AND BUILDING 823, APRIL 2016  
HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422  
HWB-HAFB-16-010**

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 17, 2016. NMED hereby issues this Disapproval with the following comments.

**1. Page 5-1, Section 5.0, 1<sup>st</sup> Bulleted Item**

This item indicates that a *Draft Sampling and Analysis Plan/Quality Assurance Project Plan* (SAP/QAPP, AECOM, 2015) has been prepared to support the proposed work at Solid Waste Management Units (SWMUs) 122 and 123 and at Building 823 (a newly identified Area of Concern [AOC]). This SAP/QAPP "contains the AECOM Standard Operating Procedures (SOPs) that will be used to conduct various activities associated with Work Plan implementation". The NMED was not provided a copy of this SAP/QAPP and the Work Plan lacks information specific to the procedures for soil and groundwater sampling and analysis and other site characterization activities.

Revise the Work Plan to provide descriptions specific to the proposed characterization activities at both sites in sufficient detail for the reader to understand the scope of the proposed work and the methods that will be used to complete the work, including all data collection and verification methods. 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.

2. **Page 5-2, 2<sup>nd</sup> and 5<sup>th</sup> Paragraphs**

These paragraphs indicate that groundwater and soil sampling procedures are presented in Sections 5.4 and 5.5. These sections should be labeled 5.3.4 and 5.3.5, respectively.

Revise the Work Plan accordingly.

3. **Page 5-4, Section 5.3.3.1, 1<sup>st</sup> Paragraph and Figure 3-2**

This paragraph indicates that five new monitoring wells will be installed at the Building 823 site in the approximate locations shown on Figure 3-2. Proposed numbering of the monitoring wells was not provided. In addition, because the presumed groundwater flow direction is to the southwest, NMED recommends that the location of the northern-most monitoring well be moved approximately 80 feet north to the vicinity of the northeast corner of Building 823 to provide upgradient definition of the groundwater plume.

Revise Figure 3-2 accordingly and include proposed monitoring well numbering.

4. **Page 8-1, Section 8.1, Last Bulleted Item**

Under the section subtitle *Supplemental RFI Report*, this item indicates that a work plan for any additional investigation needed to complete the characterization will be provided. The Permittee is advised that a work plan for additional investigation activities at either site must be submitted as a stand-alone document, and not part of a Supplemental RCRA Facility Investigation (RFI) Report. Submittal of a work plan as part of a RFI 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 any proposed characterization activities that includes the necessary background information and the rationale for the proposed work.

5. **All Site Location Figures**

NMED requires that figures/maps provided in work plans and reports show a coordinate system (e.g., State Plane, UTM, latitude/longitude).

Revise all site location figures to satisfy this requirement.

6. **Figure 1-4**

This Figure provides the potentiometric surface of SWMUs 122 and 123. The date of the measurement is not provided.

Revise the legend to include the measurement date.

7. **Figure 3-1**

The legend for Figure 3-1 for SWMUs 122 and 123 indicates that it depicts “proposed” soil boring and monitoring well locations. This figure shows existing monitoring well locations rather than proposed soil borings or monitoring wells. The legend should also indicate that it depicts the proposed soil gas vapor survey area.

Revise the legend of the figure accordingly.

8. **Figure 3-1 and Section 1.3**

AOC-T (site SS-02/05, POL Storage Tank Spill Site) is a site requiring corrective action that is located approximately 200 feet to the northeast and upgradient of SWMUs 122 and 123. Groundwater contaminants for AOC-T consist of volatile organic compounds, primarily benzene and 1,2-dichloroethane. According to the *SS-002 – Supplemental RFI Work Plan, Figure 1-3* (AECOM, 2016), this contaminant plume extends southerly to within approximately 240 feet northeast of the proposed soil gas survey area for SWMUs 122 and 123.

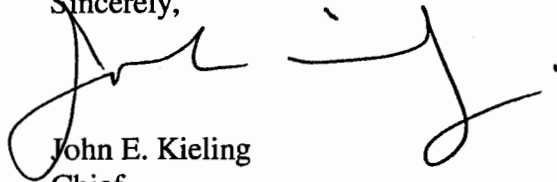
Revise Figure 3-1, or prepare an additional figure, to depict the southerly extent of the groundwater contaminant plume from AOC-T in relation to the site features of SWMUs 122 and 123. In addition, the issues associated with the nearby source of groundwater contamination at AOC-T must be addressed in Section 1.3 of the subject Work Plan, Summary of Existing Assessment Data.

The Permittee must submit a revised Work Plan that addresses 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 and an electronic redline-strikeout version of the revised Work Plan showing where all changes have been made to the plan.

Mr. Adam Kusmak  
December 30, 2016  
Page 4 of 4

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  
D. Griffin, HAFB  
C. Hendrickson, EPA, Region 6 (6MM-RC)  
L. King, EPA, Region 6 (6MM-RC)

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HAFB-16-010