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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 7, 2017

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

**RE: DETERMINATION OF ADMINISTRATIVE INCOMPLETENESS
CLASS 3 PERMIT MODIFICATION REQUEST FOR CORRECTION ACTION
COMPLETE STATUS FOR SEVEN AREAS OF CONCERN
HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422
HWB-HAFB-16-021**

Dear Mr. Kusmak:

The New Mexico Environment Department (NMED) has received two separate Class 3 Permit Modification Requests (PMRs) petitioning for corrective action complete (CAC) status for a total of seven Areas of Concern (AOCs) at Holloman AFB (the Permittee). The first request, received on July 29, 2016, addressed the following six (6) sites: AOC-J (SS-13), AOC-PRI-A (OT-32), AOC-UST-221 (TU503), AOC-UST-901 (TU506), AOC-UST-298 (TU508), and AOC-UST-7003 (TU518). The second request, received on August 2, 2016, addressed only site AOC-UST-1097 (TU505). At the Permittee's request, these two requests have been combined into one PMR for CAC.

NMED has determined that the PMR is not administratively complete in accordance with 20.4.1.900 NMAC, incorporating 40 CFR §§270.41 through 270.43. NMED provides the following comments that must be addressed before a technical review of the submittal can be conducted in accordance with the New Mexico Hazardous Waste Permit and Corrective Action Fee Regulations, 20.4.2.201.B(2) NMAC.

Comments

1. AOC-PRI-A (OT-32), the Primate Research Lab Sewer Line, is currently listed on Table B (*Summary of Solid Waste Management Units and Areas of Concern With Corrective Action Complete Without Controls*) of Appendix 4-A of the Permittee's Resource Conservation and Recovery Act Hazardous Waste Facility Permit (the Permit). The comment for the listing states that "EPA listed the site in 1988 as a SWMU with no further action required". It is apparent that the EPA had no knowledge of the potential for groundwater contamination in a monitoring well at the site in 1988. Since the discovery of this potential groundwater contamination in 2007, the NMED has required further investigation of the site, with the intention of moving this site to Table A of the Permit, *Summary of Solid Waste Management Units and Areas of Concern Requiring Corrective Action*. However, this site has been investigated as required before it could be officially moved to Table A and was found to be suitable for CAC without controls. Upon approval of this Class 3 permit modification, this AOC will remain on the aforementioned Table B.

The Permittee must revise the PMR to provide clarification of these issues regarding AOC-PRI-A.

2. The PMR for six AOCs did not include any figures depicting site features or the locations of soil borings or monitoring wells and the sampling analytical results.

Revise the PMR to include these figures.

3. The PMR for six AOCs did not include any tables presenting analytical results of past sampling activities.

Revise the PMR to include these tables.

4. NMED requires that figures/maps provided in submittals include a coordinate system (i.e., State Plane, UTM, latitude/longitude).

Revise the PMRs to satisfy this requirement.

5. The PMRs did not include Tables A and B of Appendix 4-A of the Permit showing the proposed revisions.

Revise the PMRs to satisfy this requirement.

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6. In the "History/Current and Anticipated Future Land Use" Sections of the PMR for six AOCs, neither the current nor future anticipated land use was provided.

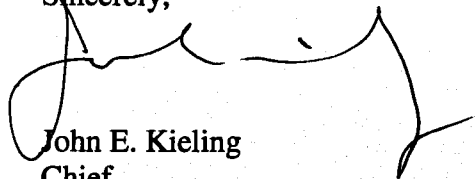
Revise the PMR to include this information.

7. Combine all seven AOCs into one PMR.

The Permittee must submit a revised Class 3 PMR that addresses the comments included in this Determination to NMED no later than **April 7, 2017**. The submittal must include a response letter that identifies where the changes have been made to the PMRs and an electronic redline-strikeout version of the PMR with all native files, including tables and figures. Finalized paper copies must also be provided.

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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