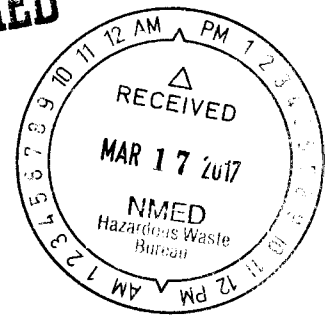




DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 49TH WING (ACC)
HOLLOMAN AIR FORCE BASE NEW MEXICO

ENTERED



14 March 2017

ADAM M. KUSMAK, GS-13, USAF
Chief, Installation Management Flight (49 CES/CEI)
49th Civil Engineer Squadron (49 CES)
Holloman Air Force Base, NM

New Mexico Environment Department
Attn: Mr. John Kieling, Chief
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6063

Dear Mr. Kieling,

Holloman AFB is pleased to submit Responses to New Mexico Environment Department Comments dated November 7, 2016 on the Remedial Investigation Report for the SR859a Former Skeet Range 2 (synonymous with TS859a) and TS862a Jeep Target Area Skeet Range Munitions Response Sites.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions regarding this submittal, please contact me at (575) 572-6675 or by email at adam.kusmak@us.af.mil.

Sincerely,

KUSMAK.ADAM.
M.1263331806

Digitally signed by KUSMAK.ADAM.M.1263331806
DN: c=US, o=U.S. Government, ou=DoD, ou=PKI,
ou=USAF, cn=KUSMAK.ADAM.M.1263331806
Date: 2017.03.14 15:52:42 -0600

ADAM M. KUSMAK, GS-13, USAF

Attachment(s): Response to NMED Comments on SR859a Former Skeet Range 2 and TS862a Jeep Target Area Skeet Range Remedial Investigation Report.

cc:

- Mr. David Strasser, NMED HWB (w/Atch)
- Mr. Cornelius Amindyas, NMED HWB (w/o Atch)
- Mr. Chuck Hendrickson, USEPA (w/CD)
- Mr. David Griffin, HARB (w/Atch)
- Mr. Charles Schick, HAFB (w/Atch)
- Mr. Brian Renaghan, AFCEC (w/CD)
- Mr. Scott Clark, Kirtland AFB (w/CD)

Common Comment and Response Worksheet (Version 3)

Date		Surveillance Activity Number					Document Title (version)		Contract/TO Number	
11/7/2016							RI report SR859a and TS862a Holloman AFB		FA8903-13-C-0008	
Item	Source	Section	Page	Para	Line	Class	Comment	Response		
1	NMED	General					<p>The report for the Phase II Comprehensive Site Evaluation (CSE) conducted in 2013 at both Munitions Response Areas (SR859 and TS862) recommended splitting them into two Munitions Response Sites (MRSs) each SR859 (34.3 acres) and SR859a (8 acres), and TS862 (34.6 acres) and TS862a (5.7 acres). This was recommended based on the perceived lack of Munitions Constituents (MC) exceeding regulatory screening levels at MRSs SR859 and TS862, which were recommended for No Further Action in the CSE Phase II Report. The smaller MRSs (SR859a and TS862a) were recommended for future munitions response actions due to MCs (lead and polycyclic aromatic hydrocarbons (PAHs)) in soil that exceed NMED soil screening levels. The proposed responses included soil/clay target debris excavation and disposal and post-excavation confirmation sampling. NMED agrees with the recommendations for the smaller MRSs. However, the subject Remedial Investigation Report (Report) agreed with the recommendations of the Phase II CSE Report in proposing no further munition response action for the larger MRSs (SR859 and TS862). NMED does not agree with this recommendation. Figures 4 and 7 of the Report (Visual Reconnaissance Results) show that lead shot (a source of lead contamination in soil) and clay target debris (a source of PAH contamination in soil) are scattered throughout both MRSs SR859 and TS862. A walkover of both MRSs conducted on July 30, 2015 by NMED and base environmental staff found visible masses of lead shot and clay target debris scattered extensively on the ground surface at both of the larger MRSs. It appears that the Phase II CSE sampling methods failed to detect the contaminants associated with the lead shot and clay target debris, which led to conclusions based upon results which are not representative of site conditions.</p>	<p>Noted. The SR859 (synonymous with TS859) and TS862 MRAs were investigated during the CSE Phase II under CERCLA, and although lead shot and clay target debris were found throughout the MRAs, the results from the soil samples collected using EPA approved methodology (SW846 3050/6010 which specifies removal of particles larger than 2mm and any foreign objects such as sticks, leaves, and rocks) did not indicate unacceptable risk from concentrations of contaminants in soils for portions of the MRAs identified as SR859 and TS862 MRSs. The entire MRAs were thoroughly investigated during the CSE Phase II and soil samples collected within the areas identified as SR859 and TS862 did not indicate concentrations above screening levels, as such these areas were not carried forward under CERCLA for additional action and recommended for NFA. However, the remaining portions of two MRAs, SR859a and TS862a MRSs, were recommended for further munitions response action at the conclusion of the CSE Phase II due to PAH concentrations in soil exceeding the screening levels. The text in Section 2.4.2 Comprehensive Site Evaluation Phase II - 2013 has been revised in corresponding SR859 and TS862 sections as follows: "The CSE Phase II report <u>completed under EPA guidance</u> recommended splitting the MRA into two MRSs: SR859 (34.3 acres) was recommended for NFA due to lack of MEC and MC <u>exceeding concentrations below</u> the USEPA RSLs and SR859a..." and "Similarly, to the MRA 859, the CSE Phase II report recommended splitting the MRA into two MRSs: TS862 (34.6 acres) was recommended for NFA due to lack of MEC and MC <u>concentrations exceeding below</u> the..."</p> <p>Concentrations of PAHs in soils resulting from clay target debris on the surface, have been detected at levels exceeding USEPA and NMED screening levels at both SR859a and TS862a MRSs. These exceedances (and one small area with lead exceedances) are the driver for the continuation of the site through remedial action (i.e. soil excavation) to reach the site closeout. During previous sampling investigations throughout the entire MRAs, it was determined that lead concentrations in soil samples were below the USEPA RSLs even though lead shot remains on the surface. Sampling of the clay target debris itself will not add any benefit, as it is accepted that the clay target debris has led to the PAH soil contamination within the MRS boundary. The approved CSE Phase II recommended on SR859a and TS862a MRSs to move forward for additional activities, while the other two MRSs SR859 and TS862 were recommended for NFA. To include the areas associated with the SR859 and TS862 MRSs which have been approved for NFA during the CSE Phase II are outside the scope of work for this contract.</p>		
2	NMED						<p>The presence of lead shot and PAH-containing clay target debris has clearly been recognized in the Report. What is not recognized are the risks presented by the presence of the shot and target debris. The risk assessment exposure pathway analysis charts on Figures 12 and 13 fail to include the contamination source that is the range debris. There are current risks from exposure to this debris as well as risks of the future spread of contaminants from the debris to soil and potentially other media. Since the Permittee has not, to date, sampled the debris itself, a proper risk assessment cannot be made. The further action proposed in the Report only addresses remediation of PAH-contaminated soil at the smaller MRSs SR859a and TS862a, the process of which will also result in removal of lead contamination. It does not propose any action to further assess or remediate the lead and PAH-contamination at the larger MRSs SR859 and TS862.</p>	<p>Noted. Please see response to Item #1. As stated, the MRA CSE Phase II were investigated under CERCLA and per EPA guidance, the smaller MRSs were not carried forward for further investigations are outside the scope of work for this contract.</p>		

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3	NMED						<p>During the Phase II CSE, intrusive X-Ray fluorescence (XRF) analysis was conducted to survey the soil at both MRSs for lead. However, as stated in Section 4.5.2 of the Report, "large particles, organic matter and projectile debris were removed from the samples." The photos presented in Appendix E of the Phase II CSE Report show the projectile debris to be shot pellets. Had in-situ XRF analysis been conducted, lead concentrations would have likely exceeded screening levels because of the mass of lead shot on the surface. In addition, as stated in Section 4.5.2 of the Report, all clay target debris was removed from the soil prior to sample analysis. This sampling protocol (removing debris) presents soil sample results that are not representative of actual conditions at these MRSs.</p>		<p>Noted. XRF screening of soil samples containing lead shot particles would only confirm that the shot consists of lead. The concern during the XRF Screening conducted through the CSE Phase II investigation was to determine if lead from the shot has leached into the soil resulting in unacceptable soil concentrations. As previously stated, the CSE Phase II soil samples were collected using EPA approved methodology (SW846 3050/6010 which specifies removal of particles larger than 2mm and any foreign objects such as sticks, leaves, and rocks). Removing the debris per SW846 3050/6010 provides a sample of contaminant concentrations in soils not source material.</p>	
4							<p>The Permittee has advised NMED that a Non-Time Critical Removal Action (NTCRA) Work Plan will be submitted for continued remedial activities at the smaller MRSs SR859a and TS862a. The Permittee shall include a proposal for further remedial actions at the MRSs SR859 and TS8962.</p> <p>As one option, the Permittee may propose a sampling protocol that includes laboratory analysis of both surface and subsurface soils to 18 inches below ground surface at areas that are, or may be, impacted by the presence of lead shot and clay target debris, which shall not be removed from the soil samples prior to analysis of the samples. All samples shall be analyzed in an off-site analytical laboratory for antimony, arsenic, copper, lead and zinc and also PAHs. Any needed remedial measures will be based on the results of this sampling, including analysis of risk to human health and ecological receptors and to groundwater. The sampling protocol must include extensive sampling of soil to ensure that all "hot spots" of contamination are detected.</p> <p>Preferred by the NMED, and as an alternative to such extensive area-wide sampling and analysis and assessment of risk as described above, the Permittee may propose a presumptive remedy for both MRSs (SR859 and TS862, as well as SR859a and TS862a) by conducting remediation of surface and/or subsurface soils to remove the waste lead shot and clay target debris and contaminated soils followed by post-excavation confirmatory sampling. Any removed debris/soil must be characterized for proper disposal.</p> <p>As per a letter from NMED dated August 2, 2016, a request to extend the NTCRA Work Plan submittal due date to June 27, 2017 was granted. This should allow for adequate time to include the proposal for further remedial actions at MRSs SR859 and TS862.</p>		<p>Noted. As previously stated, areas associated with the SR859 and TS862 MRSs were recommended for NFA during the CSE Phase II, as such are not included for additional investigation and follow on remedial action under this contract.</p>	

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Item	Source	Section	Page	Para	Line	Class	Comment	Response
Column A:	Comment Identifier Number						Comment Classifications	
Column B:	Source (Commenter/Authority)						(C) Critical: Critical comments will result in a critical issue. Provide convincing support.	
Column C:	Section Number of Comment						(M) Major: Major comments are significant concerns that may result in a major issue. This category may be used with a general statement of concern followed by a detailed comment on the specific entries in the document that, considered in total, constitute the concern.	
Column D:	Page Number of Comment (first page associated with comment)						(S) Substantive: An entry in the document that appears to be or is potentially unnecessary, misleading, incorrect, or confusing.	
Column E:	Paragraph number, on page, of Comment						(A) Administrative: Administrative comments correct inconsistencies between different sections, typographical and grammatical errors.	
Column F:	Line Number (within Paragraph above) of							
Column G:	Comment Classification							
Column H:	Comment							
Column I:	Response							
Notes:	Comments must be actionable ("add the following text:...", "delete...", "change text to:") Place only one comment per row. Classify comment as C, M, S, or A.							