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ENTERED



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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 29, 2017

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

**RE: DISAPPROVAL
TS851a – FORMER SKEET RANGE, NON-TIME CRITICAL REMOVAL
ACTION WORK PLAN, JULY 2016
HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422
HWB-HAFB-16-020**

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 July 14, 2016. NMED hereby issues this Disapproval with the following comments.

1. Page xi, Executive Summary, 1st Paragraph

This paragraph states that “the Work Plan (WP) is prepared to outline the Non-Time Critical Removal Action (NTCRA) of polycyclic aromatic hydrocarbon (PAH)-impacted soils to achieve site closeout at Site TS851a”. Munitions Response Site (MRS) TS851a (former skeet range) is a 3.1-acre sub-site of the 30.5-acre MRS TS851, for which no further action is proposed. In previous documents, the Permittee has acknowledged that PAH-containing clay target debris and lead shot occur throughout MRSs TS851a and TS851. It is the NMED’s position that this debris and shot (not just the underlying soil) are RCRA-regulated wastes that constitute a potential hazard to human health and ecological receptors. In a letter dated April 26, 2016, NMED advised the Permittee that the NMED regulates corrective action at closed skeet ranges under the authority of the

5. **QAPP Worksheet #17**

This Worksheet provides a table of RSLs and SSLs that are incorrect, as follows:

Acenaphthene – RSL should be 3,600 milligrams/kilogram (mg/kg)
Anthracene – RSL should be 18,000 mg/kg
Benzo(a)anthracene – SSL should be 1.53 mg/kg
Benzo(a)pyrene – SSL should be 0.153 mg/kg
Fluoranthene – RSL should be 2,400 mg/kg
Fluorene – RSL should be 2,400 mg/kg
2-methylnaphthalene – RSL should be 240 mg/kg
Pyrene – RSL should be 1,800 mg/kg

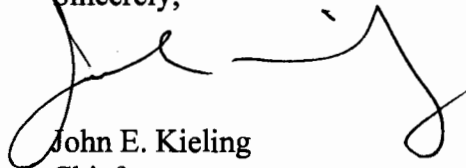
Lead is not shown on the table. The RSL and SSL should be shown as 400 mg/kg.

Revise the Work Plan accordingly.

The Permittee must submit a revised NTCRA Work Plan that addresses the comments included in this Disapproval to NMED no later than **May 25, 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
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File: HAFB 2017 and Reading
HAFB-16-020