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Governor

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Lieutenant Governor

State of New Mexico **ENTERED**
ENVIRONMENT DEPARTMENT
Hazardous Waste Bureau

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BUTCH TONGATE
Cabinet Secretary

J. C. BORREGO
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 30, 2017

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

**RE: APPROVAL WITH MODIFICATIONS
INTERIM MEASURES WORK PLAN, T-38 TEST CELL FUEL SPILL SITE,
SS059/SS524 (SWMU 229), HOLLOMAN AIR FORCE BASE, NEW MEXICO,
NOVEMBER 2016
HOLLOMAN AIR FORCE BASE, EPA ID# NM6572124422
HWB-HAFB-16-027**

Dear Mr. Kusmak:

The New Mexico Environment Department (NMED) has reviewed the Holloman Air Force Base (Permittee) document: *Interim Measures Work Plan, T-38 Test Cell Fuel Spill Site, SS059/SS524 (SWMU 229), Holloman Air Force Base, New Mexico, November 2016*, which was received on November 22, 2016. The Interim Measures Work Plan is hereby approved with the following modifications.

1. Row 2, Column 3 of Table 1, *Summary of Potentially Applicable Corrective Action Objectives*, states "NMAC 20.6.2.3103-A states "*The purpose of Sections 20.6.2.300 through 20.6.2.3114 NMAC ... is to protect all groundwater of the State of New Mexico which has a concentration of 10,000 mg/l or less TDS*". However, NMAC 20.6.2.3103.A also states that "*Non-aqueous phase liquid shall not be present floating atop of or immersed within ground water, as can be reasonably measured.*" As non-aqueous phase liquid (NAPL) can be reasonably measured at SWMU 229, HAFB

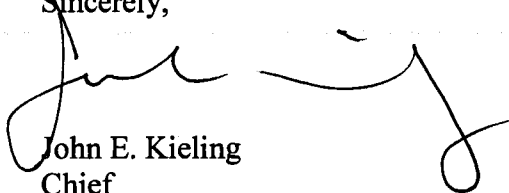
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must remove the NAPL before corrective action can be completed. In addition, NMED recognizes that groundwater in portions of Holloman Air Force Base contains high TDS; however, certain types of contamination, including fuels, can contribute to elevated TDS levels and therefore TDS levels cannot necessarily be cited as a reason why New Mexico Water Quality Control Commission standards do not apply.

2. The IM WP proposed submitting monthly/quarterly progress reports. In subsequent discussions between the Permittee and NMED, due to the large amounts of data that are being collected and analyzed, semi-annual (twice yearly) reports summarizing the monthly/quarterly events may be submitted rather than more frequent reports. The first semi-annual report shall be submitted by **September 30, 2017**.

If you have any questions regarding this letter, please contact Mr. Brian Salem of my staff at (505) 222-9576.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
B. Salem, NMED HWB
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File: HAFB 2017 and Reading
HWB-HAFB-16-027