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

...
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
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File: HAFB 2017 and Reading
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