



SUSANA MARTINEZ  
Governor  
JOHN A. SANCHEZ  
Lieutenant Governor

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

2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6313  
Phone (505) 476-6000 Fax (505) 476-6030  
[www.env.nm.gov](http://www.env.nm.gov)



**ENTERED**



BUTCH TONGATE  
Cabinet Secretary  
J. C. BORREGO  
Deputy Secretary

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

July 21, 2017

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

**RE: APPROVAL WITH MODIFICATION  
RESPONSE TO THE NOTICE OF DISAPPROVAL FOR THE 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 Holloman Air Force Base (Permittee) April 19, 2017 response to NMED's Notice of Disapproval (NOD), dated March 29, 2017, for the above referenced Non-Time Critical Removal Action Work Plan (NTCRA WP). NMED hereby approves the NTCRA WP with modification as the subject response does not adequately address NMED's comments presented in the NOD, as discussed below.

The report for a Phase II Comprehensive Site Evaluation (CSE Report) conducted in 2013 at site TS851 (now designated as Area of Concern [AOC]-851) recommended splitting it into two munitions response sites: TS851 (30.5 acres) and TS851a (3.1 acres). This was recommended based on the professed lack of munitions constituents exceeding regulatory screening levels at the larger site (TS851). This site was recommended for No Further Action (NFA) [Corrective Action Complete (CAC)] in the CSE Report. NMED did not approve CAC status as the CSE Report was not provided for review.

The smaller site (TS851a) was recommended for future response actions due to the presence of

Mr. Adam Kusmak

July 21, 2017

Page 2

polycyclic aromatic hydrocarbons (PAHs) in soil that exceed NMED soil screening levels and the observed lead shot on the surface. The proposed actions include soil excavation to a maximum depth of three feet to remove all PAH-contaminated soil, clay target debris and lead shot and will include post-excavation sampling to confirm that residential screening levels are met prior to backfilling. As noted in the Permittee's response to NOD Comment #1, the proposed response only applies to site TS851a, and not site TS851.

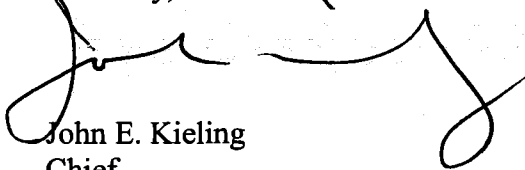
NMED hereby approves the NTCRA WP's proposal for site TS851a. However, the subject response to the NOD still supports the CSE Report's recommendation of no further action for site TS851. NMED continues to disagree with this recommendation. Figure 5-1 of the CSE Report (*Visual Reconnaissance Results*) and a walkover of AOC-851 conducted on July 30, 2015 by NMED and base environmental staff confirm that lead shot (a potential risk to ecological and human receptors) and clay target debris (a source of PAH contamination) are scattered throughout AOC-851. The presence of lead shot and PAH-containing clay target debris has clearly been recognized in the CSE Report and in the Permittee's response to NOD Comment #1. What is not recognized are the potential health risks to human and ecological receptors presented by the actual presence of the lead shot and target debris.

As NMED has not granted CAC status to AOC-851, it will remain on the list of Solid Waste Management Units/Areas of Concern (SWMU/AOCs) in the Hazardous Waste Facility Operating Permit (the Permit) that identifies SWMUs/AOCs Requiring Correction Action (i.e., Table A of Permit Part 4, Appendix 4-A). It will remain on Table A until the Permittee either removes the lead shot, clay target debris and soils that do not meet the applicable soil screening levels or can demonstrate that the presence of lead shot and clay target debris throughout site TS851 do not pose potential risks to human health and ecological receptors or that the site has been remediated.

The Permittee shall either submit a revised NTCRA WP, or submit a separate work plan, that proposes further investigation and/or remedial actions for the entirety of AOC-851 that addresses the comment above. The revised NTCRA WP must be submitted no later than **November 15, 2017**.

If you have any questions regarding this matter, please contact Mr. David Strasser of my staff at (505) 222-9526.

Sincerely,



John E. Kieling

Chief

Hazardous Waste Bureau

Mr. Adam Kusmak

July 21, 2017

Page 3

cc: D. Cobrain, NMED HWB  
C. Amindyas, NMED HWB  
D. Strasser, NMED HWB  
C. Schick, HAFB  
S. Dortman, HAFB  
C. Hendrickson, EPA, Region 6 (6MM-RC)  
L. King, EPA, Region 6 (6MM-RC)

File: HAFB 2017 and Reading  
HAFB-16-020