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HAFB

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Transmitted via e-mail

August 28, 2017

Mr. Scott Clark
Chief, Environmental Restoration
Kirtland ISS, AFCEC/CZO
Holloman AFB, NM 88330
scott.clark@us.af.mil



RE: EPA Responses to Four MRS documents, Holloman Air Force Base, New Mexico, EPA I.D. # NM6572124422

Mr. Clark:

Here are EPA's comments and feedback to Holloman Air Force Base (HAFB) on these three submittals, as requested in your August 7, 2017 email to me:

- 1) TS859a & SR862 RI Report RTC on EPA comments, submitted 10/3/2016: Holloman Air Force Base's responses to EPA's three comments were all of the "Noted" category. EPA does not concur with the responses. The RTCs simply repeated HAFB's previous responses to EPA's concerns, adding that proposed removals within the PAH-contaminated subsites would alleviate those concerns. But EPA is also concerned with the lead (Pb) shot that heavily contaminates the full, larger sites. EPA noted the "Noted" responses, but saw no need to reiterate previous comments because the NMED had begun the process of incorporating the former skeet range sites into the RCRA permit as AOCs. As AOCs, NMED would have regulatory authority for any corrective action at these sites, while EPA plays a lesser role in association with the MMRP.
- 2) ML866 & SR867 MRSs RI report, dated April 2017: EPA concurs with this report's recommendations of NFA for the two sites. However, the report was perhaps overly-dismissive of the estimated 16,000 .50 cal projectiles (about 36 per acre average) on site SR867 in stating that the investigation "found no evidence of sources of MC" (Section 5.2.2). These projectiles are munitions constituents (MC) and, as such, the report should have recognized them as such and provided at least a cursory evaluation of the magnitude/impact of this contamination.
- 3) TS851a NTCRA work plan response to EPA comments, submitted 4/19/2017: EPA accepts HAFB's responses to the two EPA comments. I note that the remaining 90% of site TS851 is outside the scope of this proposed NTCRA.

EPA has also reviewed the following recent MMRP sites submittal, and offers these comments:

SR859a Former Skeet Range 2 and TS862a Jeep Target Area Skeet Range EE/CA, dated June 2017:

1. Section 2.4.1: “The Conceptual Site Model (CSM) for exposure to lead (one screening location) and PAHs at the SR859a MRS is presented in **Figure 2-11**. The potential for exposure to PAHs results from clay target debris and residual lead contamination in the surface soil. The CSM for exposure to PAHs at the TS862a MRS is presented in **Figure 2-12**. The potential for exposure to PAHs results from clay target debris in the surface soil.” Yes, this is true as to PAHs. A problem here is that all of the lead shot, constituting the great bulk of the “residual lead contamination in the surface soil”, was removed from the soil samples before analysis. Then the facility concluded that there is no Pb risk on the sites except for the single sample exceedance of the screening level. The CSM still fails to recognize the unquantified presence of Pb shot in the site soils.

2. Section 3.2, ARARs: These two MRS have recently been defined as AOCs under NMED’s RCRA permit for HAFB, listed in Table A as sites requiring corrective action. As such, the action and cleanup levels in Appendix 4-F of the permit are ARARs for these sites, not just TBC criteria, as are many other requirements within that permit. This section should be corrected to address these ARARs.

3. Section 4.1.4, on Alternative #4, a proposed first-choice remedy for both sites: “Prior to thermal treatment the soils will be mechanically screened and any lead shot and/or clay target debris will be separated and disposed of off-site or processed at an approved recycling plant.” I have concerns and doubts about the feasibility of effectively separating the lead shot, which is small, from the soil. Will the screening process be able to accomplish this? Also, I am concerned that thermal treatment for destruction/removal of PAHs may possibly melt and/or vaporize the lead and redistribute it in the soil, thus making lead contamination worse rather than better. Adding to this concern, the cost estimate letter [at the end of Appendix A of this EE/CA] for soil filtering and thermal treatment refers only to PAHs, making no mention of considerations related to lead shot. Please address these concerns on lead shot separation and on lead melt/vaporization potential. Unless these concerns can be alleviated, Alternative #3, excavation with offsite disposal, seems to be the better remedy choice.

Should you have any questions about this letter, please contact me at (214) 665-2196 or hendrickson.charles@epa.gov.

Sincerely Yours,

Chuck Hendrickson, Project Manager
RCRA Corrective Action Section (6MM-RC)
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Cc: David Strasser, NMED HWB, david.strasser@state.nm.us

Allen, Pam, NMENV

From: Strasser, David, NMENV
Sent: Tuesday, August 29, 2017 6:55 AM
To: Cobrain, Dave, NMENV
Cc: Allen, Pam, NMENV; Amindyas, Cornelius, NMENV
Subject: FW: Holloman MMRP reviews
Attachments: Responses to 4 MRS documents_itr.docx

Dave:

Thought I'd forward this EPA letter to you. Note Hendrickson's reference to NMED in comment #1. I advised him yesterday that these sites have indeed been added to the Permit.

Dave

From: Hendrickson, Charles [hendrickson.charles@epa.gov]
Sent: Monday, August 28, 2017 3:47 PM
To: CLARK, SCOTT C GS-13 USAF AFCEC/CZO
Cc: Strasser, David, NMENV
Subject: RE: Holloman MMRP reviews

Mr. Clark,

Here are the requested review responses, along with comments on the June 2017 EE/CA for SR859a & TS862a, in the attached letter.

Chuck Hendrickson
EPA Region 6, MM-RC
214-665-2196

-----Original Message-----

From: CLARK, SCOTT C GS-13 USAF AFCEC/CZO [mailto:scott.clark@us.af.mil]
Sent: Monday, August 07, 2017 3:28 PM
To: Hendrickson, Charles <hendrickson.charles@epa.gov>
Subject: Holloman MMRP reviews

Hi Mr Hendrickson,

Hope all is well down there at Region 6. I recently had an inquiry from our contractor on document reviews and said I'd pass along the questions to you. A couple of these are just RTC's and should be easy, but the list is below, and just curious on the review status:

- (1) Response to Comment (RTC) Document regarding the EPA non-concurrence (dated August 5, 2016) with Remedial Investigation Report for TS859a Former Skeet Range 2 and SR862 Jeep Target Area Skeet Range Munitions Response Sites (MRSs) submitted to EPA on October 3 2016;
- (2) Draft-Final Remedial Investigation Report for ML866 Former Bombing Range and SR867 Possible Firing Range MRSs submitted to EPA on April 3 2017; and
- (3) Response to Comment (RTC) Document regarding the EPA non-concurrence (dated March 21, 2017) with Non-Time Critical Removal Action (NTCRA) Work Plan for TS851a Former Skeet Range MRS submitted to EPA on April 19, 2017.

None of these are that big of a hurry, they asked the question so I said I'd pass it along. Also, Holloman has a new Restoration Program Manager that has taken over (Scott Dorton), and his email is full or I'd have Cc'd him on this email.

He's still getting up to speed on the sites and all that, but you should be seeing his info on some future emails. He's a really nice guy too, we lucked out.

As always, thanks for your help - and happy Monday...

//SIGNED//

Scott Clark
Chief, Environmental Restoration
Kirtland ISS, AFCEC/CZO
505-846-9017
DSN 246-9017
Mobile 505-385-3679
scott.clark@us.af.mil