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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 20, 2018

Mr. Adam Kusmak
Chief, Installation Management Flight
49th CES/CEI
550 Tabosa Avenue
Holloman AFB, NM 88330-8458

**RE: DISAPPROVAL
FINAL FISCAL YEAR 2017 GROUNDWATER MONITORING REPORT, SS-039
MISSILE FUEL SPILL AREA (SWMUs 165, 177, 179 & 181), OCTOBER 2017
HOLLOMAN AIR FORCE BASE, EPA ID# NM6572124422
HWB-HAFB-17-018**

Dear Mr. Kusmak:

The New Mexico Environment Department (NMED) has reviewed the above referenced Groundwater Monitoring Report (Report) submitted by Holloman Air Force Base (Permittee) and received on October 13, 2017. The NMED hereby issues this disapproval for the Report with the following comments.

1. **Section 2.2, Site Description and History, Page 2-2, 5th Paragraph, and Figures:** This paragraph provides a discussion of the source of trichloroethylene (TCE) impacts, but does not provide a discussion of the source of perchlorate impacts. Revise Section 2.2 to include such a discussion. In addition, include a figure providing an isoconcentration contour map for perchlorate.
2. **Section 3.1, Footnote, page 3-1 and Section 9.0, References:** The footnote to Section 3.1 states that "wells MW39-01, -03 and -04 will not be monitored in the on-going groundwater monitoring program at SS039 due to root blockage, well screen failure, and a history of very low or non-detected VOC levels, per the *Final SS-039 Groundwater Monitoring Plan*", dated

December 2016 (GWMP). During the April 5, 2017 sampling event (for the subject Report), groundwater samples were successfully collected from MW39-01 and MW39-03. Perchlorate exceeded the NMED groundwater tap water screening level of 13.8 micrograms per liter ($\mu\text{g/L}$) at 26 $\mu\text{g/L}$ in MW39-03 and was detected below the screening level in MW39-01 at 3.1 $\mu\text{g/L}$. TCE was detected in MW39-01 at 39 $\mu\text{g/L}$ on June 26, 2016, above the 5 $\mu\text{g/L}$ EPA Maximum Contaminant Level (MCL). Given these detections, revise Section 3.1 to provide an explanation as to why sampling of MW39-01 and MW39-03 cannot be continued since they were able to be sampled in April 2017, after completion of the 2016 GWMP. It is understood that MW39-04 cannot be sampled because of a damaged riser pipe below the surface. Upon receipt of the explanation for discontinuing the monitoring of these wells, NMED will determine the potential need for additional or replacement upgradient monitoring wells as the upgradient extent of perchlorate and 1,4-dioxane in the groundwater has not yet been defined. Also, the GWMP is not listed in Section 9.0, References. Revise Section 9.0, to include the 2016 GWMP.

3. **Section 5.0, Groundwater Monitoring Analytical Results, and Figures:** This Section provides a discussion on the analytical results of detections of contaminants in groundwater at the site. It does not include a discussion on the results for 1,4-dioxane, nor its nature and extent. Revise Section 5.0 to provide such a discussion. In addition, include a figure providing an isoconcentration contour map for 1,4-dioxane.
4. **Section 8.0, Data Evaluation and Recommendations, Page 8-1, Last Paragraph:** This paragraph states "...future groundwater analysis under the monitoring program, as needed, will be limited to VOCs [volatile organic compounds] and water quality parameters in future events, as prescribed in the approved monitoring plan [GWMP]. Additional recommendations for disposition of Site SS039 ... will be provided in the forthcoming Final RFI Report". The RFI Report, received by NMED on October 13, 2017, recommends Corrective Action Complete Without Controls for the site with, apparently, no further monitoring of groundwater is proposed.

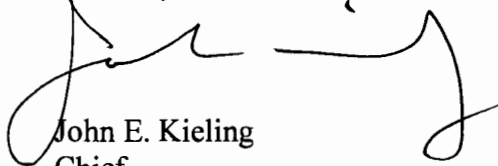
NMED's March 29, 2017 Approval With Modification letter for the GWMP required that all groundwater samples collected during the next two sampling events be analyzed for the presence of 1,4-dioxane. This analysis was not conducted during the FY2016 sampling event (June 25, 2016). It was analyzed for during the second (FY2017) sampling event (April 5, 2017). Therefore, at a minimum, one additional annual sampling event is required. Groundwater must be analyzed for VOCs (including 1,4-dioxane using EPA Method 8270-SIM), perchlorate, total dissolved solids, and water quality parameters. Revise the recommendations in Section 8.0 to propose this continued groundwater monitoring.

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The Permittee must submit a revised Groundwater Monitoring Report that addresses all comments contained in this Disapproval. In addition, the Permittee must include a response letter that cross-references where NMED's numbered comments were addressed. The Permittee must also submit an electronic redline-strikeout version of the revised Report showing where all changes have been made. The revised Report must be submitted no later than **May 31, 2018**.

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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