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State of New Mexico  **ENTERED**
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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 19, 2018

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

**RE: DISAPPROVAL
FINAL SUPPLEMENTAL RCRA FACILITY INVESTIGATION WORK PLAN,
SS061: BUILDING 1001 FUEL SPILL SITE (AREA OF CONCERN 1001),
NOVEMBER 2017
HOLLOMAN AIR FORCE BASE, EPA ID# NM6572124422
HWB-HAFB-17-023**

Dear Mr. Kusmak:

The New Mexico Environment Department (NMED) has reviewed the above referenced Supplemental RCRA Facility Investigation Work Plan (Work Plan) submitted by Holloman Air Force Base (Permittee) and received on November 17, 2017. The NMED hereby issues this Disapproval of the Work Plan with the following comments.

Comment 1

Section 3.2 of the Work Plan states that contaminants of concern are shown on Table 7-4 of Appendix B-2. This should read Table 7-3. Revise the Work Plan accordingly.

Comment 2

The Work Plan was submitted in response to a Notice of Disapproval (NOD) from NMED dated February 22, 2016 for the Accelerated Corrective Measures (ACM) Report for SS061 (April 2015).

The NOD required the submission of a work plan to conduct two additional quarters of groundwater sampling of all existing twenty-three monitoring wells (MWs), analyzing for volatile organic compounds (VOCs), 1,2-dibromoethane (EDB) and total dissolved solids (TDS). The Work Plan does not state that two additional quarters of groundwater monitoring will be conducted. The Work Plan must be revised to include a proposal for two additional quarters of groundwater monitoring.

Comment 3

The NOD required submission of a work plan to provide evidence corroborating the Permittee's assertion that the monitoring wells extending in an east-west direction along Dezonía Road have TDS concentrations of less than 10,000 milligrams per liter (mg/L) that is caused by dilution of the natural groundwater from leaking underground waterlines extending along Dezonía Road. Otherwise, it is asserted, TDS concentrations in these MWs would be greater than 10,000 mg/L, exceeding the New Mexico Water Quality Control Commission limit for potable water and designated as unfit for human consumption, a finding which could affect exposure pathways and receptors for the updated human health risk assessment (see next comment). Examples of this evidence could include providing soil boring logs for boreholes advanced near the waterlines showing wet soils next to the water lines, moisture content in soils at and below the depths of the waterlines that are significantly greater than the soil moisture content observed in soil samples collected from previous soil borings located farther from the water lines, water supply records showing unexplained losses of water, or acceptable visual evidence.

In this regard, the Work Plan proposes the installation of four new monitoring wells along Dezonía Road immediately adjacent to four existing wells, creating four well pairs. The existing monitoring wells are screened 20 to 35 feet below ground surface (bgs), which is within the range of depth to groundwater. The proposed wells will be screened from 50 to 60 feet bgs. Soil lithology is to be documented during drilling, but no soil samples are proposed to be collected, including for analysis of soil moisture content. No reason for the deeper MWs is provided nor is there a description of how close the new wells will be to existing waterlines. Nothing regarding the methodology to be used in determining the potential for evidence of the dilution of the natural groundwater is provided. The Work Plan must be revised to include a discussion of the rationale and the proposed procedures to acquire evidence of natural groundwater dilution by leaking underground waterlines.

Comment 4

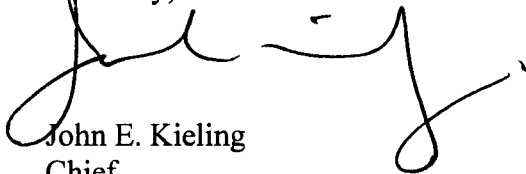
Section 1.2, Project Objectives, states that the human health risk assessment (HHRA) presented in the ACM Report would be updated with current EDB analytical results. There is no further mention of the procedures to be followed to update the HHRA. NMED will require that the HHRA be updated with the new VOC results as well as EDB results. The Work Plan must be revised to include a discussion of the proposed procedures to update the HHRA.

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The Permittee must submit a revised Supplemental RFI Work Plan 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 **August 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
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