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NEW MEXICO
ENVIRONMENT DEPARTMENT

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 31, 2018

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

**RE: APPROVAL WITH MODIFICATION
FINAL INTERIM MEASURES REPORT, SITE RW042 – RADIOACTIVE
WASTE DISPOSAL AREA (SWMU 111), MAY 2018
HOLLOMAN AIR FORCE BASE, EPA ID# NM6572124422
HWB-HAFB-18-009**

Dear Mr. Kusmak:

The New Mexico Environment Department (NMED) has reviewed the above referenced Interim Measures Report (Report) submitted on May 21, 2018 by Holloman Air Force Base (Permittee). The Report is hereby approved with the following modification.

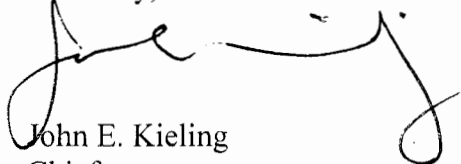
The Report indicates that in November 2016 and April 2017 four buried concrete cylinders that were stacked on-top of each other were excavated from site RW042. Each cylinder is approximately 21 inches tall and 21 inches in diameter and weighs approximately 600 pounds. They were reported to contain "unknown quantities of suspected wastes, including research animal carcasses with low-level radioactivity and contaminated laboratory and pharmaceutical supplies". Pre-excavation surveys above ground and within the excavation found no evidence of radionuclides above ambient background. Soil and groundwater in the vicinity of the cylinders and the exteriors of the cylinders were sampled and did not exhibit radiological or non-radiological waste in excess of regulatory standards. After these characterization activities were completed, the four cylinders were reburied four feet below ground surface.

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The Report recommends that site RW042 be granted corrective action complete (CAC) without controls status because the site has been adequately characterized to show that no radiological or non-radiological contaminants have been found that pose an unacceptable level of risk to human health or the environment. NMED disagrees with this recommendation. The Report indicates that the cylinders will be disposed of at a properly licensed facility. However, the Report further states that the "radiological information currently available for the four concrete cylinders is not sufficient for direct shipment to a licensed disposal facility and will require additional characterization...". The Report further indicates that the cylinders will be re-excavated and x-rayed "if a suitable contractor can be found" to determine whether a sealed source is present in the center of the cylinders. This uncertainty about whether the cylinders contain suspect waste and when, or if, they will be removed prevents the NMED from granting CAC status to the site until they are satisfactorily removed and transferred off site for disposal.

The Permittee must submit a Supplemental Interim Measures Work Plan for the proposed further characterization and removal and disposal of the cylinders by no later than **April 30, 2019**. This approval is based on the information presented in the document as it relates to the objectives of the work identified by NMED at the time of review. Approval of this document does not constitute agreement with all information or every statement presented in the document. 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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