



Michelle Lujan Grisham
Governor

Howie C. Morales
Lt. Governor

**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



James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 1, 2019

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

**RE: DISAPPROVAL
FINAL RCRA FACILITY INVESTIGATION REPORT, SS080: AREA OF
CONCERN – RR (BURIED RAILROAD DEBRIS), NOVEMBER 2018
HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422
HWB-HAFB-18-015**

Dear Mr. Kusmak:

The New Mexico Environment Department (NMED) has reviewed the above referenced Facility Investigation Report (Report) received from Holloman Air Force Base (Permittee) on December 10, 2018. The NMED hereby issues this Disapproval of the Report. The Permittee must address the following comments.

1. NMED approved the work plan for the referenced investigation on March 8, 2018. The work plan proposed the collection of groundwater samples from ten monitoring wells, including well S10-MW01. As presented in the Report, this monitoring well was not sampled but was replaced by well SWMU183-MW03 (which is cross-gradient of the contaminant plume). No reason for this substitution was provided. NMED considers monitoring well S10-MW01 to be the sentinel well for the downgradient extent of the 1,2-Dichloroethane (1,2-DCA) contamination in groundwater. The work plan proposed installing and sampling an additional sentinel well (AOCRR-MW-06) downgradient of S10-MW01. Subsequent to work plan submittal, the Permittee requested that they be allowed to relocate well AOCRR-MW-06 closer to the potential contaminant source. NMED granted this request with the assumption that well S10-MW01 would continue to be sampled.

The Permittee shall revise the Report to provide an explanation for not sampling monitoring well S10-MW01. If the well is not functional, the Permittee shall propose the installation of an additional monitoring well in the vicinity of well S10-MW01 to more accurately define the downgradient extent of the contaminant plume.

2. The Report did not include an iso-concentration map for benzene concentrations in groundwater. Revise the Report to provide a benzene iso-concentration map.
3. The Report presented investigation conclusions but did not provide any recommendations. The facility's Hazardous Waste Permit Part 4, Appendix 4-B, II. G, *RFI Outline*, requires that recommendations be provided.

The Permittee shall revise the Report to provide recommendations for continued corrective action at the site, including, but not limited to, addressing the following issues:

- a. The geophysical surveys conducted during the investigation discovered two geophysical anomalies within the area identified as the "Suspected Former Underground Storage Tank Area". The 1,2-DCA contaminant plume is shown on Figure 14 of the Report as emanating from the vicinity of the larger, southerly anomaly. The Permittee shall revise the Report to recommend actions to be taken to positively identify the anomalies discovered during the geophysical survey.
- b. The Report concluded that "visibly stained soil, strong fuel odors and elevated PID screening values" were noted in two soil borings that "may indicate a potential source area for groundwater contamination observed at Site SS080". In addition, the investigation confirmed the presence of three volatile organic compounds (1,2-DCA, benzene, and 1,2-Dibromoethane) above their respective action levels in five of the ten monitoring wells sampled during the investigation. Six metals also were detected at concentrations above their respective action levels in all of the monitoring wells. NMED notes that concentrations of total dissolved solids only exceeded 10,000 milligrams per liter in three of the ten wells. The Permittee shall revise the Report to recommend actions to be taken to address the existing soil and groundwater contamination at the site.

The Permittee must submit a revised RFI 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 RFI Report showing where all changes have been made to the Report. The revised RFI Report must be submitted no later than **July 26, 2019**.

Mr. Adam Kusmak
May 1, 2019
Page 3

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

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kieling". The signature is fluid and cursive, with a large initial "J" and "K".

John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
C. Amindyas, NMED HWB
D. Strasser, NMED HWB
C. Schick, HAFB
S. Dorton, HAFB
C. Hendrickson, EPA, Region 6 (6LCRRC)
L. King, EPA, Region 6 (6LCRRC)

File: HAFB 2019 and Reading