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ENTERED



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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

APR 24 2020

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

**RE: DISAPPROVAL
FINAL SUPPLEMENTAL RCRA FACILITY INVESTIGATION REPORT, SS061: BUILDING 1001
FUEL SPILL SITE (AREA OF CONCERN 1001), SEPTEMBER 2019
HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422
HWB-HAFB-19-017**

Dear Mr. Kusmak:

The New Mexico Environment Department (NMED) has reviewed the above referenced Supplemental RCRA Facility Investigation Report (Report) received from Holloman Air Force Base (Permittee) on October 1, 2019. The NMED hereby issues this Disapproval of the Report. The Permittee must address the following comments.

- Section 7.0:** The second paragraph states that as the results of ethylene dibromide (EDB) were below the maximum contaminant level (MCL), the inclusion of EDB would have little effect on the results of the 2014 human health risk assessment (HHRA). However, the MCL is not applied in risk assessment, as the MCL is not based solely on toxicity. Rather the tap water screening levels would be applied in the risk assessment. It is noted that the 2019 tap water screening level for EDB is 7.47E-02 micrograms per liter, $\mu\text{g/L}$, which is above the MCL of 0.5 $\mu\text{g/L}$. As such, it is likely that overall contributions of risk due to EDB are minimal; however, even minimal risk can result in excess cancer risk, if the original risk estimate was close to exceeding the target risk level of 1E-05. Further, as the

risk assessment was not updated to include the 2019 data, there is no definitive justification that EDB would not impact overall risk. The report also does not state whether inclusion of EDB would impact the inhalation risk if EDB were included. It is noted that inhalation risks as included in the 2015 ACM report is low. As noted on Table 13 (2015 Accelerated Corrective Measures HHRA), the noncancer risk to construction workers is 2E-01; inclusion of EDB would likely not result in the hazard index being above the target level of 1.0. Either revise the 2014/2015 HHRA to include the cancer and noncancer contributions to EDB or recalculate the risk assessment to include 2019 data.

2. **Section 7.0:** The risk assessment was not updated with the current groundwater data, as the 2019 data were determined to not be statistically different from the 2014 data. However, no statistical tests were provided to demonstrate this statement. Either revise the report to include the results of the statistical tests used to determine that the 2014 and 2019 data are statically the same or revise the HHRA to include the 2019 data.

The Permittee must submit a revised Report that addresses the 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 to the Report. The revised Report must be submitted by no later than **July 20, 2020**.

If you have any questions regarding this letter, please contact Ms. Naomi Davidson of my staff at (505) 222-9504.

Sincerely,



Kevin Pierard
Chief
Hazardous Waste Bureau

- cc: D. Cobrain, NMED HWB
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