



**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](http://www.env.nm.gov)



**James C. Kenney**  
Cabinet Secretary

**Jennifer J. Pruett**  
Deputy Secretary

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

May 6, 2021

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

**RE: REQUEST FOR SUPPLEMENTAL INFORMATION  
SITE RW-042 (RADIOACTIVE WASTE DISPOSAL AREA, SWMU 111) WASTE DISPOSAL  
NOTIFICATION LETTER  
HOLLOMAN AIR FORCE BASE, NEW MEXICO  
EPA ID # NM6572124422  
HWB-HAFB-18-009**

Dear Mr. Kusmak:

The New Mexico Environment Department (NMED) received the U.S. Air Force (Permittee) Holloman Air Force Base (Facility) *Site RW-042 (Radioactive Waste Disposal Area, SWMU 111) Waste Disposal Notification Letter (Notification)*, on February 10, 2021.

NMED has reviewed the *Final Interim Measures Report, Site RW042 - Radioactive Waste Disposal Area (SWMU 111)* (Report) as part of a records review in preparation for a preliminary determination that corrective action is complete. A Class 3 modification request for Corrective Action Complete for SWMU 111 cannot be evaluated until the following comments concerning risk assessment are addressed:

**1. Risk Assessment - Antimony**

**NMED Comment:** The Reporting Limit (RL) for antimony is above the background reference value but well below the residential screening level. Even if antimony were retained for risk assessment at the RL, no adverse risk would be noted. Antimony was also not detected at elevated levels in the downgradient wells, indicating there is likely no elevated antimony contamination. The Permittee must discuss the RL for antimony as an uncertainty in the risk assessment.

**2. Risk Assessment - Arsenic**

**NMED Comment:** Four numerical results were collected for arsenic, with the results being below the residential screening level; the remaining results were non-detect with the RL above the residential screening level. Arsenic was detected in downgradient groundwater wells at levels equal to the groundwater standard. However, the levels for arsenic were greater in the upgradient well (MW01). It is likely that arsenic is present at levels representative of background, but lines of evidence are needed to address the elevated RLs. If sufficient lines of evidence cannot be provided to exclude arsenic as a site contaminant, the Permittee must resample the monitoring wells for arsenic and utilize an analytical laboratory that can provide an RL for arsenic at or below the screening level.

**3. Risk Assessment - Selenium**

**NMED Comment:** The RL for selenium is below the residential screening level. Even if selenium were retained for risk assessment at the RL, no adverse risk would be noted. Selenium was also not detected at significant levels in either the upgradient or down gradient groundwater wells. These lines of evidence must be discussed as an uncertainty in the risk assessment.

**4. Risk Assessment - Thallium**

**NMED Comment:** The RL is above the residential screening level and in some cases, is above the industrial screening level. Thallium was not detected at significant levels in either the upgradient or downgradient groundwater wells. Similar to arsenic, lines of evidence are needed to justify the presence or absence of thallium to address the elevated RLs. If sufficient lines of evidence cannot be provided to exclude thallium as a site contaminant, the Permittee must resample the monitoring wells for thallium and utilize an analytical laboratory that can provide an RL for arsenic at or below the screening level.

The Permittee must provide a letter addressing the comments above no later than **November 1, 2021**.

Mr. Adam Kusmak  
May 6, 2021  
Page 3

If you have any questions regarding this letter, please contact Naomi Davidson at (505) 690-7567.

Sincerely,

**Kevin** Digitally signed  
**Pierard** by Kevin Pierard  
Date: 2021.05.06  
15:41:54 -06'00'

Kevin M. Pierard, Chief  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
B. Wear, NMED HWB  
N. Davidson, NMED HWB  
L. King, EPA Region 6 (6LCRRC)  
G. Lyssy, EPA Region 6 (6LCRRC)  
C. Schick, HAFB  
M. Fuchs, HAFB

File: HAFB 2021 and Reading