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Certified Mail - Return Receipt Requested



June 17, 2022

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

**RE: DISAPPROVAL
FINAL LONG-TERM MONITORING REPORT 2021 T-38 TEST CELL FUEL SPILL SITE,
SS059/SS524 (SWMU 229), FEBRUARY 2022
HOLLOMAN AIR FORCE BASE, NEW MEXICO
EPA ID # NM6572124422
HWB-HAFB-22-001**

Dear Mr. Kusmak,

The New Mexico Environment Department (NMED) received the U.S. Air Force (Permittee) Holloman Air Force Base (Facility) *Final Long-Term Monitoring Report 2021 T-38 Test Cell Fuel Spill Site, SS059/SS524 (SWMU 229), February 2022* (Report) on March 15, 2022. NMED has reviewed the Report and hereby issues this Disapproval with the following comments:

1. Analytical Detection Limits

NMED Comment: The analytical detection limits for groundwater contaminants hexachlorobenzene, 1,2-dibromo-3-chloropropane, and 1,2-dibromoethane (EDB) exceeded the NMED screening levels. Data with analytical detection limits that are not at or below the NMED screening levels are considered to be data quality exceptions, must be identified as such wherever presented, and cannot be used for decision-making purposes, including compliance determinations. "Analytical detection limits", for the purpose of this discussion, are defined as the reporting limit (RL), limit of detection (LOD), practical quantitation limit (PQL), or limit of quantitation (LOQ); the designation for reported detection limits will vary by analytical laboratory and/or facility. Note that the method detection limit (MDL) does not satisfy the requirement that the analytical detection limits are at or below the screening level. If a facility has the ability to contract the services of an analytical laboratory for analyses with analytical detection limits that are below the screening levels, which is a requirement of the facility permit, the facility must do so for all data used to establish compliance with NMED screening levels. For highly contaminated sites where compliance

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determinations will not be conducted for an extended period of time, NMED will work with a facility to approve the use of less costly and less accurate methods for tracking purposes until compliance determination becomes an issue. For compliance, the facility is typically required to provide a minimum of 8 quarterly sampling events for groundwater where the analytical detection limits are below the screening level and the compound in question is non-detect below the screening level.

A facility has the option to petition for removal of specific compounds from the site's Chemicals of Potential Concern (COPCs) list; removal depends upon successful demonstration to NMED that the compound is not present at the site in concentrations that would pose a risk to human health or the environment. For instance, if a compound is found to be non-detect below the screening level for eight consecutive groundwater sampling events, the compound would likely be eligible for removal from the COPC list, depending upon potential for future contaminant migration.

In the situation where a facility is unable to locate an analytical laboratory that can provide analytical detection limits which meet the screening levels for specific compounds, a facility may provide multiple detailed and documented lines of evidence (LOEs) to support a claim that the compound is unlikely to be found at a particular site, accounting for future migration. The inability of a laboratory to meet the analytical detection limits at or below the screening level criteria is not considered a LOE. If the facility can successfully demonstrate to NMED that the compound is unlikely to be found at a site, NMED will approve removal of that compound from the site's COPC list required for sample analyses. These LOEs may include, but are not limited to:

- a) The physical and chemical properties of the compound;
- b) The lack of any historical use of the compound, products containing the compound, or products containing parent compounds which may degrade into the compound in question;
- c) The physical characteristics of the site, such as depth to groundwater; and
- d) Historical analytical data.

Future groundwater monitoring and fixed gas measurements must utilize analytical laboratories and methods which can provide analytical detection limits for each contaminant that are below their respective NMED screening levels. Revise the Report to discuss data quality exceptions and identify them in all data, figures and tables.

2. Table 4-1: Summary of Groundwater Analytical Results, March 2021 and Table 4-2: Groundwater Vapor Intrusion Evaluation, March 2021

NMED Comment: Tables 4-1 and 4-2 contain several undefined symbols, including F, EM8, and EXC. R and EXC are not accompanied by values in the table. Revise the tables to include definitions for all symbols used and all appropriate values.

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The Permittee must submit a revised Report (two hard copies and two electronic copies) that corrects all deficiencies noted in this Disapproval. The revised Report must be accompanied by a response letter (also included as an appendix) that details where the NMED's comments were addressed and cross-references NMED's numbered comments. In addition, the Permittee must submit an electronic redline-strikeout version of the revised Report that shows where all changes were made to the Report. The revised Report must be submitted no later than **September 30, 2022**.

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

Sincerely,

Digitally signed by Rick
Shean
Rick Shean
Date: 2022.06.17
16:08:40 -06'00'

Rick Shean, Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
B. Wear, NMED HWB
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