



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
1445 ROSS AVENUE
DALLAS, TEXAS 75202

JUN 14 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Colonel William H. Koelm
Commander
833rd Combat Support Group
Holloman Air Force Base, New Mexico 88330-5000



Dear Col. Koelm:

In accordance with Section VI.D.2. of the Federal Facilities Compliance Agreement (FFCA) for Holloman Air Force Base (HAFB), which was effective December 20, 1988, Region 6 of the Environmental Protection Agency (EPA) has reviewed comments from the New Mexico Environmental Improvement Division (NMEID) on the proposed closure plan for the HAFB lagoons. Region 6 has determined that HAFB failed to submit a closure plan that meets the requirements set forth in Section VI.D.1. of the FFCA.

Section VI.D.1. requires submittal of a closure plan that accords with Title 40, Part 265 Subparts G and K, Code of Federal Regulations. Subpart G (Closure and Post-Closure) in Section 265.111(c) requires compliance with Section 265.228 which is the closure performance standard for surface impoundments. Section 265.228 requires that closure of hazardous waste surface impoundments meet one of two conditions: (1) clean closure, or (2) closure in place. Clean closure requires the removal or decontamination of all waste residues, contaminated containment system components, and contaminated subsoils. Closure in place requires the elimination of free-liquids and installation of a final cover.

Either of these options is inconsistent with the proposed HAFB plan which would remove some contaminated soils and allow for continued use of the lagoons as sewage treatment lagoons. Further, the HAFB plan does not address the closure of all the lagoons. The entire lagoon system (seven lagoons) has been used to treat hazardous waste. Therefore, as the requirement under Section VI.D.1. of the FFCA called for submittal of a closure plan which met the § 265.228 requirements and as HAFB has clearly not submitted such a plan, the EPA is, by this letter, requiring submittal of a closure plan meeting those requirements within thirty (30) days of receipt of this letter.

A copy of this letter will be sent to NMEID. If you have any questions about the letter, please have your staff call Court Fesmire at (214) 655-2192.

Sincerely yours,

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Allyn M. Davis
Director
Hazardous Waste Management Division (6H)

cc: Bill Blankenship
New Mexico Environmental and Improvement Division