

Page 4-105; Hydropunch Survey: Is the hydropunch survey going to determine where to locate additional monitoring wells? Please clarify.

SWMU 101

Page 4-108; Evaluation of existing Data: Holloman must submit the results of the previous work done under the IRP in the revised RFI Workplan. EPA will determine whether this work is acceptable for the RFI and whether any additional investigations/actions are needed. Also, will 2 feet be deep enough, such was the case with borings at the Missile Fuel Spill Area.

SWMU 183

Page 4-110; Objectives and Sampling: This sections are unacceptable to EPA. Please submit in the revised workplan an investigation/process that is acceptable to EPA. EPA can be flexible on a phased approach investigation of this SWMU, such as in sections per year, etc.

Area of Concern - U

Page 4-112; Evaluation of Existing Data: Please identify building 1166 and its septic tank drainfield on Figure 4-26.

Schedule

Page 9-1 and Figure 9-1: The timeframes for submitting the draft RFI Report (2 years from approval date) and initiating fieldwork (5 months) are excessive. Please revise the schedule to shorten these timeframes.

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL		# of pages ▶
To	Stephanie Stubbins	1
From	Rich Meyer	
Dept./Agency	NMAD	Phone #
		214-655-7442
Fax #	214-655-3743	Fax #
		214-655-6460
NSN 7540-01-317-7368		5099-101
GENERAL SERVICES ADMINISTRATION		

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**Deficiency Comments on Holloman AFB
Table 2 SWMU's RFI Workplan**

SWMU's 119 and 2

Page 4-2, SWMU Description and History: Please explain by what means is this waste oil from the oil/water separator (o/ws) transferred to the adjacent waste oil tank.

Page 4-2; Evaluation of Existing Data: Please indicate whether past records has shown that the ow/s (and its associated piping) has overflowed or leaked.

Page 4-3; Objectives, 2nd Paragraph: EPA is not sure what is meant by the first two sentences. However, if contamination is found, the full extent of contamination must be determined, in addition to any requirements by the NM UST regulations.

Page 4-3; Integrity Testing: How long a time will the water be measured. In addition, how will the associated piping be tested. In addition, please justify how integrity testing ensures that the o/sw will not overflow from the top and contaminate the soil.

Page 4-4; Soil Sampling: If the unit does not fail integrity testing, will Holloman include the integrity testing results in the RFI Report? In addition, since past testing of the waste oil tank shows that it has leaked and there has been a past fuel spill, soil borings will be mandatory for this unit.

SWMU's 15 & 120

Page 4-7, SWMU Description and History: Please explain by what means is this waste oil from the oil/water separator (o/ws) transferred to the adjacent waste oil tank.

Page 4-8; Objectives, 2nd Paragraph: If contamination is found, the full extent of contamination must be determined, in addition to any requirements by the NM UST regulations.

Page 4-3; Integrity Testing: How long a time will the water be measured. In addition, how will the associated piping be tested. In addition, please justify how integrity testing ensures that the o/sw will not overflow from the top and contaminate the soil.

Page 4-4; Soil Sampling: If the unit does not fail integrity testing, will Holloman include the integrity testing results in the RFI Report?

SWMU's 121 & 17

Page 4-12; SWMU Description: Please include the full results of the vapor monitoring system around the tank. Please explain by what means is this waste oil from the oil/water separator (o/ws) transferred to the adjacent waste oil tank.

SWMU 63

Page 4-58; Soil Sampling: Holloman should sample intervals that are visually contaminated. Does SW8240 cover all the constituents that would be in paint thinners and paints?

SWMU 71

Page 4-62; Sampling and Analytical Plan: Why are the boreholes not drilled closer to the unit, such as 2 feet away? EPA believes that the perimeter boreholes should go to 5 feet. What intervals will be sampled in the soil borings if the HNU shows no reading at all intervals. Holloman should also sample intervals that are visually contaminated. In addition, why are metals not being analyzed for when they will be analyzed for at SWMU 63, which also handled paint and paint thinners?

SWMU 78

Page 6-66; Soil Sampling: Holloman should also sample intervals that are visually contaminated and additionally be analyzed for semivolatiles.

SWMU 75

Cannon needs to initiate a Class 3 permit to remove the SWMU from the RFI.

SWMU 91

Page 4-72; Soil Sampling: Justify why the two proposed samples are not centered to the runoff area? EPA feels that the borings should go to five feet. Holloman should also sample intervals that are visually contaminated and additionally be analyzed for semivolatiles.

SWMU 136

Page 4-75; Sampling and Analytical Plan: If the washrack slopes to the south, why is one soil boring taken on the North? EPA feels that both borings should be located in the drainage pit, unless Holloman can justify otherwise. What intervals will be sampled in the soil borings if the HNU shows no reading at all intervals. Holloman should also sample intervals that are visually contaminated and be analyzed additionally for semivolatiles.

SWMU 141

Page 4-79; Objectives: This SWMU is in the permit to be investigated, Holloman must investigate this SWMU or give an acceptable justification why this SWMU should not be investigated, otherwise, Holloman will be in violation of the permit.

SWMU 118

Page 4-40; Objectives: EPA specifically made a comment pertaining to the collection pit in a August 28, 1992, NOD letter to Holloman. EPA recommended that a soil boring be taken where the old discharge pipe is located. Please clarify whether there is a discharge pipe?

In addition, EPA recommended that Holloman delineate the full extent of (horizontal and vertical) groundwater contamination. Please revise the workplan, in the appropriate sections, to include the additional groundwater investigations for this area.

SWMU 129

Page 4-43; SWMU Description and History: Please explain how the washings (liquids) from the drainage troughs got into the underground tanks.

Page 4-47; Sampling Plan: Please clarify why there is two surficial soil samples outside the two drainage troughs western side, but no samples outside the other sides of the troughs. Also, Holloman needs to justify why only surface samples are being taken in the drainage trough, liquids may have gone through the bottoms of the troughs. In addition, what intervals will be sampled in the soil borings if the HNU shows no reading at all intervals. HNU's will not pick up lead contamination. Furthermore, Holloman should sample intervals that are visually contaminated and additionally be analyzed for semivolatiles.

SWMU's 54 and 55

Page 4-51; Objectives: It is not apparent to EPA why a soil gas investigation was chosen. Were the drums from SWMU 54 and 55 stored as far away as 75 feet at times from the main SWMU? If not, it would seem more prudent to use soil borings around the SWMU's. Please clarify.

Page 4-52; Soil Sampling: Holloman should sample intervals that are visually contaminated and additionally be analyzed for semivolatiles. In addition, what intervals will be sampled in the soil borings if the HNU shows no reading at all intervals. HNU's will not pick up lead contamination.

SWMU 56

Page 4-54; Sampling and Analytical Plan: EPA would like to see one more boring near the stained next to paved area.

Page 4-54; Soil Sampling; Holloman should sample intervals that are visually contaminated and additionally be analyzed for semivolatiles.

Also, will the vault be integrity tested?

Page 4-26; Soil Sampling: If the unit does not fail integrity testing, will Holloman include the integrity testing results in the RFI Report?

SWMU's 39, 127, & 135

Page 4-29; SWMU Description: Please explain by what means is this waste oil from the oil/water separator (o/ws) transferred to the adjacent waste oil tank and the drainage pit.

Page 4-29; Sampling and Analytical Plan: EPA feels that a backhoe trench across the pit area might give a better indication of contamination from the unit.

Page 4-30; Sampling Plan: If contamination is found, the full extent of contamination must be determined, in addition to any requirements by the NM UST regulations.

SWMU's 40, 128, & 138

Page 4-33; SWMU Description: Please explain by what means is this waste oil from the oil/water separator (o/ws) transferred to the adjacent waste oil tank and the drainage pit.

Page 4-43; Objectives, 2nd Paragraph: If contamination is found, the full extent of contamination must be determined, in addition to any requirements by the NM UST regulations.

Page 4-17; Integrity Testing: How long a time will the water be measured. In addition, how will the associated piping be tested. In addition, please justify how integrity testing ensures that the o/sw will not overflow from the top and contaminate the soil.

Page 4-17; Soil Sampling: If the unit does not fail integrity testing, will Holloman include the integrity testing results in the RFI Report?

Page 4-34; Sampling and Analytical Plan: EPA feels that a backhoe trench across the pit area might give a better indication of contamination from the unit. Even if Holloman feels that the trenching is not feasible, 1 soil boring should be taken where the outfall effluent hit the ground and another sample taken inside the pit. If contamination found is during removal, the full extent of contamination must be determined, in addition to any requirements by the NM UST regulations.

Page 4-36; Sampling Plan: If samples past the 0-2' show visual contamination, they should also be sampled and additionally analyzed for semivolatiles.

Page 4-37; Analytical Plan: See above comment.

Page 4-13; Integrity Testing: How long a time will the water be measured. In addition, how will the associated piping be tested. In addition, please justify how integrity testing ensures that the o/sw will not overflow from the top and contaminate the soil.

Page 4-14; Soil Sampling: If the unit does not fail integrity testing, will Holloman include the integrity testing results in the RFI Report?

SWMU's 123 & 22

Page 4-16; SWMU Description: Please explain by what means is this waste oil from the oil/water separator (o/ws) transferred to the adjacent waste oil tank.

Page 4-17; Objectives, 2nd Paragraph: If contamination is found, the full extent of contamination must be determined, in addition to any requirements by the NM UST regulations.

Page 4-17; Integrity Testing: How long a time will the water be measured. In addition, how will the associated piping be tested. In addition, please justify how integrity testing ensures that the o/sw will not overflow from the top and contaminate the soil.

Page 4-17; Soil Sampling: If the unit does not fail integrity testing, will Holloman include the integrity testing results in the RFI Report?

SWMU's 126 & 36

Page 4-20; SWMU Description: Please explain by what means is this waste oil from the oil/water separator (o/ws) transferred to the adjacent waste oil tank.

Page 4-21; Integrity Testing: How long a time will the water be measured. In addition, how will the associated piping be tested. In addition, please justify how integrity testing ensures that the o/sw will not overflow from the top and contaminate the soil.

Page 4-21; Soil Sampling: If the unit does not fail integrity testing, will Holloman include the integrity testing results in the RFI Report?

SWMU's 125 & 32

Page 4-25; SWMU Description: Please explain by what means is this waste oil from the oil/water separator (o/ws) transferred to the adjacent waste oil tank.

Page 4-26; Integrity Testing: How long a time will the water be measured. In addition, how will the associated piping be tested. In addition, please justify how integrity testing ensures that the o/sw will not overflow from the top and contaminate the soil.

SWMU 164

Page 4-82; SWMU Description and History: Please indicate on Figure 4-20 the portions of the pond that were excavated in November 1992 from the JP-4 fuel spill. Also, please locate where the standing product was located. In addition, has this unit received waste from any of the surrounding buildings?

Page 4-83; Sampling and Analytical Plan: At least one soil boring should be located where they excavated part of the pond.

Page 4-83; Soil Sampling: What intervals will be sampled in the soil borings if the HNU shows no reading at all intervals. Holloman should also sample intervals that are visually contaminated and be analyzed additionally for semivolatiles.

SWMU 124

SWMU Description and History: How long has this tank been at its current location?

Page 4-86; Objectives: RFI objective is to determine whether there has been a release from the tank, Holloman should revise the workplan to include soil samples, at least one sample in the mentioned stained area.

SWMU 155

Page 4-91; Sampling plan: Soil borings need to be taken at selected intervals to find out whether contamination from the unit has occurred. Samples from 1/2 to 1 foot is not sufficient. Please revise the workplan.

SWMU 156

Page 4-95; Soil Sampling: EPA believes that more soil borings needed. Some additional borings need to be taken within the interior of the imhoff system.

SWMU 184

Page 4-97; SWMU Description and History: Why is Holloman not going to do an integrity check on the splitter box? Is there any records of the splitter box malfunctioning or overflowing?

Page 4-100; Analytical Plan: EPA believes that volatile, semivolatiles and pesticides should also be analyzed.

SWMU's 177, 179 & 181

Page 4-103; Objectives: Please clarify the last two sentences under this section. It would appear to EPA that all sampling efforts should be included in the RFI Report.