UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

JUL 29 1993

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Mr. Howard E. Moffitt
Deputy Base Engineer
Environmental Management
550 Tabosa Avenue
Holloman Air Force Base, New Mexico 88330-8458

Subject: Notice of Deficiency for Phase II RFI Workplan for Table 1 SWMUs

Dear Mr. Moffitt:

The Environmental Protection Agency (EPA), Region 6 has completed a technical review of Holloman Air Force Base's (HAFB's) RCRA Facility Investigation (RFI) Phase II Workplan for Table 1 SWMUs dated 27 April 1993, and we have determined that the workplan is deficient. A list of deficiencies is enclosed for your response.

A revised Phase II Workplan which addresses the enclosed deficiencies is due to EPA and the New Mexico Environment Department by 1 September 1993. If HAFB's revised Phase II Workplan is not approvable, the EPA may make further modifications as required. The modified workplan then becomes the approved Phase II RFI Workplan. If Holloman expects any difficulties in meeting this deadline, written notice and a request for additional time should be submitted to Region 6 as soon as possible.

If you have any questions regarding this notice of deficiency letter or the enclosed deficiencies, please contact Lowell Seaton of my staff at (214) 655-8304.

Sincerely yours,

for William K. Honker, P.E.
Chief, RCRA Permits Branch

Enclosure

cc: Benito Garcia, NMED
Dave Morgan, NMED

Deficiency Comments on Holloman Air Force Base
Phase II RFI Workplan for Table 1 SWMUs

AOC-T (IRP Sites 2 & 5) POL Spill Sites 1 & 2

The spill of JP-4 fuel pooled in the southeast corner of the bermed area. More soil gas surveys should be conducted southeast of the bermed area. Three additional soil gas surveys should be located south of proposed soil gas locations 36, 38, and soil boring SB-02&5-15 respectively.

One additional soil boring should be drilled to 25 feet BGL outside of the bermed area. This would be a total of eight soil borings, four inside and four outside of the bermed area.

SWMU 114 (IRP Site 3) Tetraethyl Lead Disposal Site

This SWMU has known contamination based on the Phase I RFI. The one proposed additional soil boring located two feet from the Phase I soil boring will not further delineate the lateral and vertical extent of contamination. Four soil borings in a concentric circle around the disposal pit should be drilled to determine the lateral and vertical extent of contamination.

There is some confusion as to the extent of contamination discovered during the Phase I RFI. Is just the shaded area on Figure 5-4 contaminated or is the extent of contamination greater? Section 5.2.2.2 of the workplan states that lead was detected in all surface soil samples during the Phase I RFI.

If all of the surface soil samples collected during the Phase I RFI were contaminated with lead, then additional surface soil samples oriented north-south are required beyond the 120 foot sampling trench sampled during the Phase I RFI. In addition, surface samples oriented east-west are required to delineate the lateral extent of contamination.

SWMU 102 (IRP Site 4) Acid Trailer Burial Site

What is the purpose of installing one upgradient monitoring well but no downgradient wells? Please explain the purpose of this well when there are no proposed downgradient wells for comparison.

If the four monitoring wells installed during the Phase I RFI are to be sampled, then the Groundwater Sampling narrative needs to be revised. Please show the four existing monitoring wells on Figure 5-5 and update the chart on page 5-22 to include the sampling of the four existing downgradient wells.

SWMUs 4 & 82 (IRP Site 8) Refuse Truck Collection Washrack

The summary chart on page 5-28 is incorrect. The narrative states that 14 soil borings will be performed but the chart lists only 12. Please correct the chart.

SWMU 229 (IRP Site 14) Former Entomology Shop

No comments.

SWMUs 118, 132, & AOC-A (IRP Site 16) Existing Entomology Shop

The workplan proposes four soil borings around the old discharge pit (SWMU 132). The workplan proposes to collect 2-ft split spoon samples (i.e. 0-2 ft, 2-4 ft) per boring and composite the samples into one laboratory sample per boring. Compositing of samples is discouraged. Two discrete samples per boring should be sent to the laboratory for analysis.

SWMU 113 (IRP Site 20) Grit Chamber Burial Site

No comments. Holloman AFB should submit a permit modification request to EPA to delete this SWMU from the RFI.

SWMU 134 (IRP Site 24) Former Maintenance Area

No comments.

SWMU 104 (IRP Site 29) Former Army Landfill

The proposed monitoring wells are located too far (60' to nearly 200') from the boundary of the landfill. The monitoring wells should be located within 20 feet of the landfill.

SWMU 113 (IRP Sites 30 & 33) Grease Trap Disposal Pits

On page 5-55, the workplan states that the Phase I 29 Site RFI ranked the site as dirty with unacceptable exposure and risk scenarios. The site was recommended for further action. However, the recommendations in section 5.2.10.3 recommend no further action except long term monitoring. Please explain this discrepancy.

SWMUs 129 & 178 (IRP Site 36) Former Unconventional Fuels Storage Area

No comments.

AOC-L (IRP Site 37) Early Missile Testing Site

According to the workplan, petroleum hydrocarbons and PCBs were detected at all transformer pads. This contamination must be addressed. Please submit a workplan or documentation to EPA describing proposed remedial actions for these transformer pads.

Holloman AFB wishes to submit a permit modification request to delete this SWMU from the RFI. EPA must review and approve of HAFB's remedial actions at this SWMU prior to considering the permit modification request. Long term monitoring is recommended for this site.

SWMUs 165, 177, 179, and 181 (IRP Site 39) Missile Fuel Spill Site

No comments.

Section 5.5 - Monitor Well Installation Plan

Section 5.5.2.2 of the workplan describes how depths and screened intervals of monitor wells will be determined. Consideration should also be given to the contaminants of concern at the SWMU under investigation. If dense nonaqueous phase liquids (DNAPLs) such as trichloroethane (TCE) are potential contaminants, then monitor well screens will need to be placed at the bottom of the aquifer. As proposed in the workplan, all monitor well screens (10 feet in length recommended in section 5.5.3.1) are to installed at the soil/water interface.

Section 7.0 - Long Term Monitoring Plan

According to Webster's II New Riverside University Dictionary, "biannual" means: happening twice each year; and "biennial" means: happening every second year. Is it Holloman AFB's intent to conduct long term sampling twice each year or every two years? Please clarify this confusion.