

July 23, 1993

Mr. Howard E. Moffitt
Deputy Base Civil Engineer
49 CES/CEV
550 Tabosa Avenue
Holloman Air Force Base, NM 88330-8458

*Steve
What do you
think about
this?
Bob*

JUL 29 1993

Dear Mr. Moffitt:

The New Mexico Environment Department has reviewed the Phase II workplan for sites in Table 1 of Holloman Air Force Base's HSWA Permit, under the auspices of our DSMOA agreement. We offer the following comments.

Site 16 - Existing Entomology Shop (SWMUs 118, 132, and AOC-A): On page 5-39 the workplan suggests sampling existing monitor wells for BTEX constituents. We believe ground water samples should be analyzed for pesticides as well, since they are known to be present.

Site 24 - Former Maintenance Area (SWMU 134): The workplan recommends (p. 5-48) EPA method 8020 analyses for ground water samples; we believe method 8240, covering a wider range of compounds, would be more appropriate.

Site 29 - Former Army Landfill (SWMU 104): We have no objection to the work proposed, but suggest that an upgradient monitor well would help reduce any uncertainty about migration of contaminants from the landfill.

Site 36 - Former Unconventional Fuels Storage Area (SWMUs 129 and 178): Tank removal needs to be done following New Mexico UST regulations, including requests for extensions of time if needed, notification of the UST Bureau (through DSMOA contacts if desired) in advance of removal, and following UST Corrective Action regulations regarding investigation of removed tanks. A copy of the UST Soil/Water Sampling and Disposal Guidelines is enclosed for clarification of the UST regulations. If there are any questions as to how to integrate UST requirements with the other HSWA and IRP requirements applicable to the site, please call me at 827-2754 or Bob Sweeney of the UST Bureau at 827-2566.

Site 37 - Early Missile Testing Site (AOC-L): It not explained what will be done with soils exceeding 1000 ppm TPH; plans for these areas should be made clear.

Sincerely,



David Morgan
Environmental Specialist, DSMOA
Ground Water Protection and Remediation Bureau

c: Benito Garcia, NMED HRMB
Lowell Seaton, EPA Region 6



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