

March 25, 1994

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

Dear Mr. Moffit:

The New Mexico Environment Department (NMED), Defense/State Memorandum of Agreement (DSMOA) staff offer the following response to Holloman AFB's Response to Comments on the Preliminary Assessment and Site Investigation (PA/SI) Report for Four Waste Sites:

**Site SS-12 - JP-4 Fuel Line Spill Site**

As discussed by telephone on March 2, 1994, further investigation of the nature and extent of the contamination at this site is still needed. We believe it would be appropriate to concentrate first on defining what contaminants, if any, are present in the apparently contaminated "gray" or "foul-smelling" layer present in both the pipeline area and the housing area. (Based on the log in Appendix B.1, it appears that boring BH-12-6 was not deep enough to determine whether the gray stratum was present at that location.)

We suggest a minimum of three soil borings, one each in the housing area, the storm sewer outfall area, and the pipeline area. They should extend below any visual, olfactory, or instrumental evidence of contamination, and should be sampled for laboratory analysis from the most highly contaminated zone. Analyses should include at least field screening capable of detecting methane, and analysis for TPH, lead, and appropriate fuel constituents. Laboratory data should be provided to characterize the stratum in question, and either laboratory or clear field evidence is needed for the "bottom" of the contamination.

We cannot accept as definitive the results of the soil gas survey in determining of the horizontal extent of contamination. Too few passive soil gas samplers were actually collected, and the "real time" sampling was in fact head space sampling, which could not provide evidence of soil gas not originating in the sample. Also, the zone of apparent contamination is below the water table which would inhibit vapor migration. We are willing to defer delineation of the horizontal extent of contamination pending clear results on whether the gray zone is actually contaminated; but if contamination is present, its horizontal extent must be better defined.

Bruce King  
Governor

Judith M. Espinosa  
Secretary

Ron Curry  
Deputy Secretary

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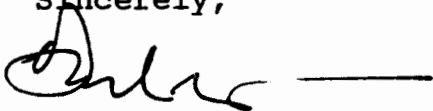
All field observations and measurements, including organic vapor measurements, should be reported in appropriate boring logs. Some misunderstandings relating to this PA/SI report might have been cleared up if a little more information had been included in the report.

If methane is found in appreciable concentrations, the potential for its migration into houses or other structures must be given appropriate consideration.

**Site SD-27 - Pad 9 Washrack Area**

Please send us copies of field instrument readings and any other evidence indicating that the most highly contaminated zone was sampled, and that contamination diminished with depth.

Sincerely,



David Morgan  
DSMOA group, New Mexico Environment Department

cc: Steve Pullen, HRMB, NMED  
Lowell Seaton, EPA Region 6