HAFB 96

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**CERTIFIED MAIL**
**RETURN RECEIPT REQUESTED**

September 20, 1996

ENTERED

Howard E. Moffitt
Deputy Base Civil Engineer
49 CES\CEV
550 Tabosa Ave
Holloman Air Force Base, N.M. 88330-8458

**SUBJECT: Notice of Deficiency (NOD): 300-Pound Open Burn Unit.**
**EPA I.D. Number NM6572124422**

Dear Mr. Moffitt:

The Hazardous and Radioactive Materials Bureau (**HRMB**) of the New Mexico Environment Department (**NMED**) has reviewed for technical adequacy, the Holloman Air Force base (**HAFB**) October 1992 Closure Plan for the 300 pound Open Burn (**OB**) treatment unit as required under the New Mexico Hazardous Waste Management Regulations 20 NMAC 4.1 (Revised November 1, 1995).

After reviewing the Closure Plan, the NMED has found the Closure Plan to be technically deficient. The enclosed Attachment A lists the required information necessary for NMED to declare the Closure Plan technically complete adequate and consider it for approval.

The information requested in Attachment A must be submitted to NMED within thirty (30) days of receipt of this NOD. Please present the required information in three hard copies and on a 3.5" diskette compatible with Word Perfect 5.2. Failure to submit the required information in this designated time may result in issuance of a Notice of Violation (NOV), or denial of the Closure Plan.

If you have any questions regarding this matter you may contact Mr. Cornelius Amindyas at (505) 827-1561.

Sincerely,

Benito Garcia, Chief
Hazardous and Radioactive Materials Bureau

cc: Barbara Hoditschek, HRMB
David Neleigh, ~~EPA Region~~ 6
Files: Red and Reading 96

**ATTACHMENT A**

**Notice of Deficiency for HAFB Open Burn Closure Plan**

September 20, 1996

I. A. **Topographic Map** as required in 20 NMAC 4.1.900 incorporating 40 CFR §270.14(b)(19).

The Closure Plan must include a map or maps that:

1. show the terrain for a distance of 1,000 feet outside the unit at a map scale of 1 inch equal to not more than 200 feet with appropriate contour lines;

2. include a wind rose diagram showing prevailing wind directions and velocities;

3. the legal boundaries (and title) of the unit;

4. show access control to the OB treatment unit;

5. any on-site or off-site wells, buildings, and drainage and flood control barriers; and

6. locate the treatment unit, buildings on- and off-site, public roadways, and passenger railways.

7. enumerate any Solid Waste Management Units (SWMUs) that are in the vicinity of the OB unit.

II. A. **Closure Plan Submittal** as required in 20 NMAC 4.1.600 incorporating 40 CFR §265.112 through §265.115, and

1. Describe the procedures for removal of hazardous waste, residues or post investigation derived waste, and contaminated soils including the location of disposed soils when removed;

2. Define methods for sampling and testing surrounding soils and criteria for determining decontamination levels;

3. Describe how the fallout fan will be delineated.

4. Delineate both the vertical and horizontal extent of the kickout resulting from the past activities that had occurred at the OB unit.

5. Describe how each zone of contaminant plumes will be established from the center of the OB unit outwards. Explain how HAFB will determine lateral extent of the plume and where sampling will end.

**Protection of Ground Water**

Additional Information requirements as required by 20 NMAC 4.1.600 incorporating, 40 CFR §265.90 (c)

**A.** **Hydrology** as required in 20 NMAC 4.1.900 incorporating 40 CFR §270.23(b). The Closure Plan must describe the hydrology below the open burn unit. (This may be available through published or private reports. Provide copies of the references used.).

**B.** **Provide site-specific data for initially characterizing the OB unit and surrounding area.** Hydrology and geology supportive of published reports must be confirmed through direct methods of data collection. Any saturated zones must be identified. Discuss appropriate spacial and temporal intervals for soil sample data collection prior to initiating any data collection program.

**C.** **Soil Monitoring** as required in 20 NMAC 4.1.500 incorporating 40 CFR 264.601(A)(2) and 40 CFR §270.23(b).

The Closure Plan must:

1. contain the proposed soil monitoring program, including sample collection, sample preservation and shipment, sampling and analysis procedures, and chain of custody control;

2. indicate the parameters selected and the EPA approved or equivalent acceptable analytical method for each parameter;

3. describe background values for each proposed monitoring parameter or constituent; and

4. describe the proposed sampling, analysis and statistical comparison procedures.

If HAFB wishes to pursue a ground water monitoring waiver, HAFB must satisfy all applicable regulations listed below, CFR §265.90 (c) and submit this waiver to HRMB within the timelines outlined above for review.

1. All or part of the ground water monitoring requirements of this subpart may be waived if the owner can demonstrate that there is a low potential for migration of hazardous waste or hazardous waste constituents from the facility via the uppermost aquifer to water supply wells (domestic, industrial, or agricultural) or to surface water.

   This demonstration must be in writing and must be kept at the facility. This demonstration must be certified by a New Mexico independently registered professional engineer and must establish the following:

   (1) The potential for migration of hazardous waste or hazardous waste constituents from the facility to the uppermost aquifer, by an evaluation of :

   (i) a water balance of precipitation, evapotranspiration, runoff, infiltration; and

   (ii) unsaturated zone characteristics (i,e., geologic materials, physical properties, and depth to ground water); and

   (2) The potential for hazardous waste or hazardous waste constituents which enter the uppermost aquifer to migrate to a water supply well or surface water, by an evaluation of :

   (i) saturated zone characteristics (i.e., geologic materials, physical materials physical properties, and rate of ground-water flow); and

   (ii) the proximity of the facility to water supply wells or surface water.