

HAFB08



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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 11, 2008

Ms. Debbie Hartell, Chief
Environmental Flight
49 CES/CEV
550 Tabosa Ave.
Holloman AFB, NM 88330-8458

**SUBJECT: NOTICE OF DISAPPROVAL: WORK PLAN FOR ACCELERATED
CLOSURE MEASURES AT SITE SS-13, JULY 2007
HOLLOMAN AIR FORCE BASE, NM, EPA ID# NM6572124422
HWB-HAFB-07-009**

Dear Ms. Hartell:

The New Mexico Environment Department (NMED) has reviewed the subject Work Plan, which was submitted for the performance of additional site characterization activities and voluntary corrective measures at Site SS-13 (AOC-J) at Holloman Air Force Base (the Permittee). NMED has determined that the Work Plan cannot be approved at this time, as revisions are necessary. The following are the deficiencies the Permittee is required to address before the NMED can make a decision about approval of the Work Plan:

GENERAL COMMENTS

1. Several sections of the work plan reference North Wind, Inc. documents (e.g. ENVP-002) that provide guidance on sampling activities, decontamination, waste determinations, health and safety considerations, etc. The guidance documents were not provided with sufficient detail in the respective sections. Therefore, the Permittee is required to submit the following North Wind documents for NMED review and approval: ENVP-002, 005, 006, 007, 008, 014, 018, 021 and the Site Safety and Health Plan (NWI, 2007e).

2. The work plan proposes soil and groundwater sampling activities at the site. However, the work plan does not propose the collection of trip blanks or field duplicates for quality control purposes. The Permittee must revise the work plan to include appropriate quality control sample collection and analysis.

SPECIFIC COMMENTS

3. **Figures 3-1 and 3-2**

NMED requires that figures/maps provided in work plans and reports be to scale and show a coordinate system (i.e., UTM, latitude/longitude) and the boundaries of the site. The Permittee must revise Figures 3-1 and 3-2 to satisfy these requirements.

4. **Page 1, Section 1.3, 3rd Sentence**

This sentence states that a maximum of 0.04 *mg/L* of arsenic was identified in five soil samples. The Permittee must revise the sentence to read 0.04 *mg/kg* of arsenic.

5. **Page 8, Section 3.1.3**

This section provides a description of the locations of the proposed soil borings. However, no where in the work plan are the anticipated depths of the soil borings provided. The Permittee is required to revise the work plan to provide this information.

6. **Page 8, Section 3.2, 1st Sentence**

This sentence states that "up to 10 cubic yards" of soil is to be excavated and disposed of. The Permittee is required to clarify what will occur if sampling results show the need to excavate more than 10 cubic yards of soil.

7. **Page 9, Section 3.2, 2nd Sentence**

This sentence states that confirmation samples will be collected following contaminated soil excavation but does not specify how this will be accomplished. The Permittee must revise the work plan to state that samples will be collected at a frequency of one per 20 linear feet per excavation sidewall with a minimum of one per sidewall. A minimum of two soil samples shall be collected from any sidewall greater than 18 feet in length. Also, confirmatory sampling shall be biased to areas with the greatest potential for contamination.

8. **Page 9, Section 3.2, 4th Sentence**

This sentence states that confirmation samples will be analyzed for arsenic. The Permittee must revise the work plan to state that samples will also be analyzed for all hazardous constituents that were discovered during the investigation sampling that were found to be either above the soon-to-be established background levels for inorganic constituents or above detection limits for organic constituents.

9. **Page 9, Section 3.2, Last Sentence**

This sentence states that once the confirmation sample results are received the excavation will be backfilled. The Permittee must revise the work plan to state that the excavation will not be backfilled until confirmation sampling confirms the absence of contaminated soil. This may mean conducting additional excavation and confirmation sampling based on the results of the first round or subsequent rounds of confirmation sampling.

10. **Page 9, Section 3.3, 3rd Sentence**

This sentence states that monitoring wells *may* be installed using pre-packed well casings. The Permittee must revise the work plan to state that monitoring wells *will* be installed using pre-packed well casings. If this is not the case, the alternative monitoring well installation procedures must be stated.

11. **Page 10, Section 3.4, Second Paragraph**

This paragraph states that groundwater samples will be analyzed for VOCs, SVOCs, RCRA Metals, herbicides and pesticides. The Permittee must revise the work plan to state that groundwater samples will also be analyzed for total dissolved solids (TDS).

12. **Page 14, Table 5-1**

This table states that the maximum holding times for soil samples for SVOCs, pesticides and herbicides will be *14* days to extraction. The Permittee must revise the Table to state that the maximum holding times for SVOCs, pesticides and herbicides will be *7* days to extraction.

13. **Page 15, Section 6, 1st Sentence**

This sentence states that North Wind will submit a *Site Closure* Report. The Permittee must revise the work plan to state that North Wind will submit an *Accelerated Corrective Measures* Report.

14. Page 15, Section 6, 5th Bulleted Sentence

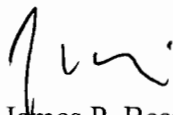
This sentence states that tables with sample results will be submitted. The Permittee must revise the work plan to state that all laboratory sampling reports and QC data will also be submitted.

15. Page 15, Section 6, Last Paragraph, 1st Sentence

This sentence states that North Wind will submit the report in Draft, Draft-Final and Final versions. The Permittee must revise the work plan to state that only a Final version will be submitted to the NMED.

Please respond to this Notice of Disapproval within sixty (60) calendar days of receipt of this notice. If you have any questions regarding this matter or if you would like to discuss the comments prior to your response, please contact David Strasser of my staff at (505) 222-9526.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

cc: J. Kieling, NMED HWB
W. Moats, NMED HWB
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File: HAFB 2007 and Reading
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