DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 49TH FIGHTER WING (ACC)
HOLLOMAN AIR FORCE BASE, NEW MEXICO

ENTERED

NOV 0 2 2009

A. David Budak
Deputy Base Civil Engineer
550 Tabosa Avenue
Holloman AFB NM 88330-5840

New Mexico Environment Department
Attn: Mr. James Bearzi
Hazardous Waste Bureau
2905 Rodeo Park Drive East
Santa Fe NM 87105-6303

Dear New Mexico Environment Department

Holloman AFB is pleased to submit the Basewide Septic Tank Solid Waste Management Units (SWMU) Final RCRA Facility Investigation Work Plan (HAFB 09-003) for your review. Compact Disk (CD) copies of this document will be submitted to you directly from the Army Corps of Engineers.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions, please contact Mr. David Scruggs of our Asset Management Flight at (575) 572-5395.

Sincerely

A. DAVID BUDAK, YF-3, DAFC

Attachment:
Basewide Septic Tank SWMU RFI Work Plan

cc:
(w/Atch)
Mr. David Strasser
Hazardous Waste Bureau
5500 San Antonio Dr. NE
Albuquerque, NM 87109

(w/o Atch)
Mr. Will Moats
Hazardous Waste Bureau
5500 San Antonio Dr. NE
Albuquerque, NM 87109

(w/o Atch)
Ms. Laurie King
USEPA, Region 6 (6PD-F)
1445 Ross Ave., Ste 1200
Dallas, TX 75202-2733

Response to NMED's Comments Submitted 31 July 2009 and received 4 August 2009 for
Notice of Disproval: Basewide Septic Tank Solid Waste Management Units, RCRA Facility Investigation Work Plan, January 2009
Holloman Air Force Base, NM, EPA ID#NM6572124422
HAFB-09-003

Item #	NMED Comment	HAFB Response
1.	Table of Contents, Page i, Item 3.2.6; Page 3-9, Section 3.2.6, Header; and Figure 3-2, Final Block of Decision Tree: The Permittee shall revise "Remedial Investigation Report" to read "RCRA Facility Investigation Report".	**Response:** Agree. **Action:** Edited table of contents, section 3.2.6 header, and Figure 3-2 to reference "RCRA Facility Investigation Report" in place of "Remedial Investigation Report."
2.	Page 1-1, Section 1, 1st Sentence: This sentence states that "Additional investigation of several Solid Waste Management Units (SWMUs) relative to currently inactive or removed septic systems across Holloman Air Force Base (HAFB) is required." The Permitte is advised that the inactive or removed septic systems will not be officially considered SWMUs until after characterization and assessment of potential releases to the environment has been accomplished through the proposed Work Plan. Until that time, the septic systems are to be considered "sites". Once it has been determined that a release to the environment has occurred that will require either additional investigation or immediate corrective action, the Permittee shall comply with the facility's RCRA Permit Part 4, Section IV.B.1 and IV.B.2 regarding notification requirements for newly identified SWMUs. The Permittee must revise this sentence to read: "Additional investigation of several inactive or removed septic systems located across Holloman Air Force Base (HAFB) is required to determine if they are to be considered Solid Waste	**Response:** Agree. **Action:** 1st sentence is replaced with suggested sentence.

Item #	NMED Comment	HAFB Response
	Management Units (SWMUs) requiring further investigation or corrective action required by HAFB's RCRA Permit, Part 4, Corrective Action".	
3.	Page 3-2, Section 3.1, 4th Bulleted Item; Page 3-3, Section 3.1, 5th Bulleted Item; and Page 3-6, Section 3.2.3, 1st Paragraph, 2nd Sentence: The Permittee shall revise these items and the aforementioned sentence to indicate that the "Technical Memorandum" shall be submitted to the NMED for concurrence, to assist in determining placement of each site into the proper category, and to determine which constituents of concern will be analyzed for at each site.	**Response:** Agree. **Action:** Added NMED as a recipient of the "Technical Memorandum" allowing them to aid in developing final work efforts.
4.	Page 3-3, Section 3.1, 1st Bulleted Item: The Permittee shall revise this item to indicate that the results of these investigations shall be submitted to the NMED for a determination as to which category the system should be placed in.	**Response:** Acknowledge, ultimately NMED will be highly involved in determining the category each septic system is assigned. Under the proposed process, NMED will be able to help make this determination during technical memorandum development and review efforts outlined in step 5. If it is determined that any initially assigned, during step 1, category 3 septic systems require field work it shall be accomplished. **Action:** A note is added to step 1 that clarifies if, during the technical memorandum evaluation process, a category 3 septic system is later determined to require additional investigation work it shall be accomplished.
5.	Page 3-5, Section 3.2.2; Page 3-7, Section 3.2.4.1; and Page 3-8, Section 3.2.4.2: The Permittee shall add the following to the list of potential analytes and analytical methods: Polychlorinated biphenyls (PCBs) by EPA Method 8082 and Total cyanide by EPA Method 9010A.	**Response:** Agree. **Action:** Added specified analytes with preparation and methods, however, recommend updating methods 8082 to more recent version 8082A. Typographical errors were also corrected.
6.	Page 3-6, Section 3.2.3, 7th Bulleted Item, 2nd Sentence: The Permitte shall revise this sentence to state that the figures will	**Response:** Agree. **Action:** Sentence was clarified to ensure the applicable datum(s) reference for coordinate

Item #	NMED Comment	HAFB Response
	include an indication of the datum projection that was used (e.g., New Mexico State Plane Coordinate System, Central Zone, 1983 [ft]).	system used is noted on the figure.
7.	Page 3-7, Section 3.2.4.1, 1st Paragraph, 2nd Sentence and Page 3-8, Section 3.2.4.2, 1st Paragraph, 2nd Sentence: The Permittee shall revise the acronym "HSA" in these two sentences to read "HSA".	**Response:** Agree. **Action:** Changed acronym to "HSA."
8.	Page 3-7, Section 3.2.4.1: The Permittee shall revise this section to indicate that if the septic system is found to be a seepage pit or a septic tank without intact sidewalls or bottom, a soil boring shall be advanced through the center of the pit/tank, in addition to proposed soil borings within any leachfield. Two soil samples shall be collected as proposed in the Work Plan.	**Response:** Agree. Verification of the type of system as either a seepage pit or a septic tank will be done through review of plans and visual inspection in the field during baseline assessment activities, while condition of the sidewalls/bottom of those systems found to be septic tank will be performed through visual observation via remote camera during initial system assessment activities. If a system is determined to be a seepage pit or a structurally compromised septic tank then a boring will be advanced through the middle of the system with two soil samples collected, otherwise no boring/sampling is required. **Action:** Information requiring: a) determination if the system is a seepage pit or a septic tank is added in Section 3.2.1, b) a remote camera operation for each system found to be a septic tank is added in Section 3.2.2, c) results reporting added to the 4th bullet in Section 3.2.3, and d) boring and sampling requirements if the system is found to be a seepage pit or a structurally compromised septic tank is added to Section 3.2.4.1.
9.	Page 3-9, Section 3.2.6, 2nd Paragraph: This paragraph states that a risk-based approach will be used to evaluate results from the sampling activities. The Permittee shall provide a detailed description of the procedures to be followed for any	**Response:** Agree. **Action:** Text has been added to Section 3.2.6 to describe the process for a risk-based evaluation, including comparison of chemical detections, development of an exposure model, calculation of site-

Item #	NMED Comment	HAFB Response
	risk assessment to be performed.	specific SSLs, and a site-specific screening level evaluation.
10.	Page 3-10, Section 3.2.6, 2nd Paragraph, 1st Sentence: This sentence states that a TPH screening level of 940 mg/kg will be used to evaluate the laboratory analytical data, which is the action level for soil contaminated with kerosene or jet fuel. The Permittee shall revise this sentence to state that a TPH screening level of 800 mg/kg will be used, which is for unknown oil.	**Response:** Agree. **Action:** Reference to 940 mg/kg is changed to 800 mg/kg. Reference to kerosene and jet fuel is changed to unknown oil.
11.	Page 3-12, Section 3.3.2.1.2, 1st Paragraph: The Permittee shall revise this paragraph to indicate that if the septic system is found to be a seepage pit or a septic tank without intact sidewalls or bottom, a temporary monitoring well shall be installed through the center or the pit/tank, in addition to the proposed monitoring wells to be installed within any leachfield area. The well shall be installed and sampled as proposed in the Work Plan.	**Response:** Agree. See response to comment #8. **Action:** Information requiring the installation and sampling of a temporary groundwater monitoring well installed within the soil boring advanced through the center of a seepage pit or a structurally compromised septic tank is added.
12.	Page 3-13, Section 3.3.2.1.3, 4th Sentence and Appendix B, SOP-8, Page 2, Section 3.0, Item C: This sentence and item state that a peristaltic pump will be used to collect groundwater samples. NMED notes that volatile organic compounds (VOCs) are part of the suite of contaminants to be analyzed for. The Permittee is advised that the use of a peristaltic pump to collect VOC samples is not permitted as degassing of the VOCs could occur. Therefore, the Permittee shall propose an alternate method of sampling groundwater (e.g., bailing or low flow submersible pump).	**Response:** Agree. Reference to obtaining groundwater samples via peristaltic pump will be removed. **Action:** Removed reference to use of peristaltic pumping method and added reference to use low flow rates that minimize drawdown during purging for groundwater sampling.
13.	Page 4-1, Section 4.1, 3rd Paragraph, 2nd Sentence: The Permittee shall revise this sentence to state that the Site Specific Addendum to the Basewide Quality Assurance	**Response:** Agree. **Action:** The referenced sentence was edited from "…Basewide Quality Assurance Project Plan to the USACE for approval." to "…Basewide Quality

Item #	NMED Comment	HAFB Response
	Project Plan shall be submitted to the NMED for approval. In particular, the NMED will be reviewing the sensitivity limits (e.g., IDLs, MDLs, RLs), data validation procedures and data reporting procedures.	Assurance Project Plan to the USACE and NMED for approval. Key elements considered for NMED review shall be instrument detection limits (IDLs), method detection limit (MDLs), reporting limits (RLs), and data validation and reporting procedures."
14.	Page 4-7, Section 4.5: The Permittee shall revise this section to state that the organizational chart and work schedule shall be submitted to the NMED for review.	**Response:** Agree. **Action:** A sentence was added allowing for the organizational chart and work schedule to be submitted to NMED, HAFB, and USACE for their review prior to initiation of any work.
15.	Table 3-2: The Permittee shall revise this table to show maximum sample holding times for the various analytes, as per SOP-5 and SOP-8 in Appendix B.	**Response:** Agree. **Action:** Table 3-2 is updated to present holding times of analytes. Preservation methods during sampling and an explained TPH section specific for DRO,GRO, and ORO sampling requirements were added.