

SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT ENTERES

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.nmenv.state.nm.us



DAVE MARTIN
Secretary

BUTCH TONGATE
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 15, 2011

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

**RE: SECOND NOTICE OF DEFICIENCY
EXPANDED CLOSURE AND POST-CLOSURE CARE PLAN
20,000 POUND OPEN DETONATION UNIT
HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422
HWB-HAFB-10-005-OD**

Dear Mr. Budak:

The New Mexico Environment Department (NMED) has reviewed Holloman Air Force Base's (the Permittee's) September 22, 2011 response to NMED's August 29, 2011 Notice of Deficiency (NOD) for the *Expanded Closure and Post-Closure Care Plan for the 20,000 Pound Open Detonation (OD) Unit*. Following review of the response, NMED has identified the following deficiencies that must be addressed:

Comment 1: Surface and Subsurface Soil Sampling

Although the Closure Plan addressed the nitroglycerin and RDX contaminated soils that were discovered during quarterly post-treatment sampling and provided Figures 1 through 3 in Appendix A showing the historical locations of associated surface soil samples, the Permittee "re-graded the OD unit to backfill the depression", which now makes it impossible to draw conclusions based on earlier findings. Moreover, subsurface soils deeper than 6 inches were never sampled for the explosives compounds and toxic metals listed on pages 1-3 and 1-4 of Appendix A of the Expanded Closure Plan. Therefore, the Permittee shall:

- a) Submit a revised sampling and analysis plan for the sampling of explosives, toxic metals, perchlorate, nitrate, and phosphorus in soils at the OD Unit. The Permittee is required to characterize the OD Unit soil for contaminants by collecting both surface samples (0-6

inches deep) and subsurface samples (up to 5 feet deep) on a 25-foot by 25-foot grid spacing. At a minimum, the 25-foot by 25-foot grid shall encompass all portions of the OD Unit that have hosted or may have hosted a pit or crater used for the treatment of hazardous waste. This sampling event shall include the areas of the OD Unit previously impacted by high concentrations of nitroglycerin and RDX and shall be done in lieu of taking samples at the proposed Geostatistical and Perchlorate sampling locations shown in Figure 3 of Appendix A.

- b) Provide a figure showing the sampling grid for collecting the soil samples described in item a) above. The figure must be shown to scale, depict the boundaries of the OD Unit, depict the active area of the OD Unit where explosive ordnance treatment took place, include a north arrow, and show a standard coordinate system (e.g., UTM, latitude/longitude).

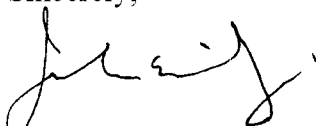
Comment 2: Hazard Index

The Permittee shall provide the steps to be used to calculate the hazard quotient from the ratios of any inorganic toxic metal concentrations above approved background levels relative to the NMED Soil Screening Levels.

The Permittees must submit a revised Expanded Closure Plan that corrects the deficiencies noted above by February 29, 2012. Further, the Permittee shall incorporate the additional information into the revised version of the Expanded Closure Plan that shall be submitted to the NMED for approval. As part of the response letter that accompanies the amended Plan, the Permittees must include a table that details where all revisions have been made to the Plan and that cross-references NMED's numbered comments. All submittals (including figures and tables) must be in the form of two paper copies and one electronic copy. In addition, the Permittees must submit an electronic redline-strikeout version that includes all changes and edits to the Plan.

If you have any questions regarding this NOD please contact Cornelius Amindyas of my staff at (505) 222-9543 or at the above letterhead address.

Sincerely,



John E. Kieling
Acting Chief
Hazardous Waste Bureau

cc: W. Moats, NMED HWB
C. Amindyas, NMED HWB
D. Strasser, NMED HWB
S. Pullen, NMED HWB
L. King, EPA-Region 6 (6PD-N)
File: HAFB 2011 and Reading
HAFB-10-005-OD