



SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT



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

RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 18, 2014

DeAnna Rothhaupt
Chief, Holloman AFB Environmental
550 Tabosa Avenue
Holloman AFB, NM 88330

**RE: DISAPPROVAL
ACCELERATED CORRECTIVE MEASURES COMPLETION REPORT
SITES OT-32 AND RW-42, SEPTEMBER 2012
HOLLOMAN AIR FORCE BASE
EPA ID # NM6572124422, HWB-HAFB-12-017**

Dear Ms. Rothhaupt:

The New Mexico Environment Department (NMED) has reviewed the Holloman Air Force Base (the Permittee) submittal *Accelerated Corrective Measures Completion Report* for sites OT-32 (Area of Concern [AOC] PRI-A) and RW-42 (Solid Waste Management Unit [SWMU] 111), dated September 2012 and received on October 29, 2012. NMED hereby issues this Disapproval for the reasons discussed below.

Site OT-32, Primate Research Lab Sewer Line (AOC-PRI-A)

According to the analytical results for ground water sampling at site OT-32, the volatile organic compound (VOC) 1,1-dichloroethene (DCE) was detected in monitoring well (MW) OT32-TMW09 at a concentration of 18 micrograms per liter ($\mu\text{g/l}$). This is more than three times the acceptable NM Water Quality Control Commission ground water standard of 5 $\mu\text{g/l}$. In addition, Figures 3-8 and 7-2 of the subject report indicate that ground water flows to the south at this site. However, this flow direction appears to be based on the ground water elevations of eight MWs placed in a straight north-south line, which cannot be used to establish an accurate flow direction. NMED suspects that ground water flow in the area is actually to the west-southwest based on measurements of groundwater elevations at other locations at Holloman Air Force Base.

Given the elevated DCE results from MW OT32-TMW09, the Permittee shall sample the ground water from this well for VOCs for a minimum of two additional quarters to confirm the previous results. The results must be reported to the NMED, after which time the NMED will make a decision regarding the need for future site characterization activities. In addition, at the same time as the analytical results are reported, the Permittee shall provide NMED with a more reliable potentiometric surface map of the site, even if additional wells or piezometers must be installed to acquire water-level data to construct the map.

Site RW-42, Radioactive Waste Disposal Area (SWMU 111)

According to Section 2.3.1 of the subject report, a 10-ft long by 5.5-ft diameter concrete cylinder is buried 2 to 4-ft below the ground surface at this site. This cylinder is suspected to contain animal carcasses containing low-level radioactivity and other pharmaceutical and medical compounds and supplies (lab gowns, syringes, etc.) which include solid wastes, some of which may be hazardous or other types of waste. According to available records, waste was placed into this container between 1950 and 1959. The quantity of waste in the cylinder is unknown and, as per current base personnel, this waste remains in place.

The Permittee is hereby advised that NMED considers this buried, waste-filled container to be a landfill as defined at 20.4.1.100 NMAC incorporating 40 C.F.R. § 260.10 and a solid waste management unit (SWMU) subject to corrective action under 20.4.1.500 NMAC incorporating 40 C.F.R. § 264.101. A SWMU where corrective action has been completed, but where waste is to be left in place, is subject to long-term controls. Because this SWMU is a landfill, it is reasonable to impose controls similar to the post-closure care requirements for a permitted landfill, which are found at 20.4.1.500 NMAC incorporating 40 C.F.R. § 264.117. These requirements include monitoring of environmental media and maintenance of the cover materials. Additionally, the Permittee would be required to conduct a corrective measures evaluation (CME) to determine the final remedy for the landfill, which also requires opportunity for public participation.

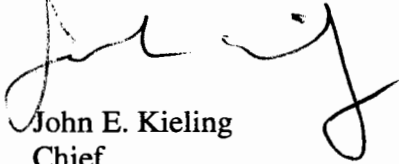
The Permittee should consider taking the necessary steps to characterize the waste contained in this buried cylinder and, based on the results, properly dispose of the waste and remove the cylinder. If, after considering the remedy evaluation and long-term controls referenced above, the Permittee still intends to leave the waste in place, the Permittee will be required to submit a CME report and long-term monitoring and maintenance plan for NMED approval prior to petitioning for corrective action complete.

The Permittee must submit a work plan for removal of the waste or notify the NMED of its decision to complete prepared a CME to leave the waste in place at SWMU 111 by no later than **November 19, 2014**. The submittal (including figures and tables, if appropriate) must be in the form of a paper copy and one electronic copy (in MS Word/EXCEL™ format).

Ms. Rothhaupt
September 18, 2014
Page 3 of 3

If you have any questions regarding this matter, please contact Mr. David Strasser of my staff at (505) 222-9526.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
W. Moats, NMED HWB
C. Amindyas, NMED HWB
D. Strasser, NMED HWB
D. Rizzuto, HAFB
C. Hendrickson, EPA-Region 6 (6PD-N)
File: HAFB 2014 and Reading
HAFB-12-017