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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 30, 2016

Adam Kusmak  
Chief, Installation Flight Management  
49<sup>th</sup> CES/CEI  
550 Tabosa Avenue  
Holloman AFB, NM 88330-8458

**RE: DISAPPROVAL  
SS-017 (AOC – Q) SUPPLEMENTAL OPERATIONS AND MAINTENANCE  
REMEDIAION PROGRESS REPORT, HOLLOMAN AIR FORCE BASE, NEW  
MEXICO, AUGUST 2016  
HOLLOMAN AIR FORCE BASE, EPA ID# NM6572124422  
HWB-HAFB-16-024**

Dear Mr. Kusmak:

The New Mexico Environment Department (NMED) has reviewed the Report: *SS-017 (AOC – Q) Supplemental Operations and Maintenance Remediation Progress Report, Holloman Air Force Base, New Mexico, August 2016*, which was received on September 2, 2016. NMED hereby issues this Disapproval with the following comments.

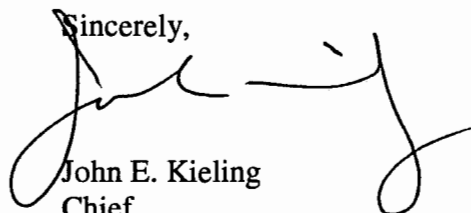
1. Holloman Air Force Base (the Permittee) recommended that three additional monitoring wells be installed to the south and southwest of the site in order to define the extent of the groundwater contaminant plume. In addition, continued groundwater sampling and analysis was recommended as well as additional soil borings to define the extent of contamination in the soil. NMED concurs with these recommendations. The Permittee's document titled *Groundwater Monitoring Plan SS-017 Base Exchange Gas Station Fuel Spill (Area of Concern Q), June 2016* was previously submitted and approved by NMED on August 5, 2016. As proposed in the subject Report, a work plan to install at least three monitoring wells and additional soil borings to define the extent of soil and groundwater contamination shall be submitted to NMED by **February 28, 2017**.

2. Monitoring well MW-BX-01 is located within 25 feet of a residence. The last sampling round conducted in May 2015 reported a benzene concentration of 0.185 mg/L in groundwater which is above the EPA Maximum Contaminant Level (MCL) of 0.005 mg/L. The proposal to conduct a risk analysis for vapor intrusion at the residence must be included in the work plan. In addition, the work plan shall include a monitoring well to be installed to the northeast of monitoring well W-4 to further define the eastern extent of the contaminant plume.
3. The header on all pages reads "SS-17 Accelerated Corrective Measures Completion Report". Correct the headers to agree with the subject title.
4. Page 1-1, Section 1, 3<sup>rd</sup> Paragraph, refers to Attachment A. There is no Attachment A in the document. Correct the reference accordingly.
5. The results of the analyses performed on the soil samples collected from borings in 2014 and 2015 should be included in text boxes on the soil boring location maps.
6. The locations of the soil borings should be noted on Figures 7-1A through 7-1E that depict groundwater analytical results.
7. The benzene concentration on Figure 7-1D for monitoring wells MW-BX-01 indicates a result of 0.19 mg/L. The actual concentration is 0.185 mg/L. Actual concentrations must be plotted rather than rounded. Correct the concentration listed on the figure.
8. The proposed locations for monitoring wells on Figure 9-1 are not adequate. The contaminant plume is not defined to the northwest of well MW-01, to the northeast of W-4, southeast of BX-01 nor the south west of MW-06. In addition to the three recommended monitoring wells, propose to install additional monitoring wells to define the extent of contamination in the locations referenced in this comment (8).
9. Additional soil borings as proposed on Figure 9-2 shall be advanced to the west of well MW-08 and to the east of monitoring well W-4 to characterize soil contamination in those areas. In addition, include the locations of previously advanced soil borings on Figure 9-2 to facilitate understanding the distribution of soil contamination.
10. Include a discussion of the significant increase in nitrate concentrations in monitoring wells MW-09, MW-10, MW-16, MW-20 and MW-23 in the revised report.
11. Correct Section header "9.1 Soils" to read "9.2 Soils" on Page 9-1 and in the Table of Contents.

12. New NMED soil screening guidance was issued in 2015 replacing the previous guidance from 2012. This will change some of the exceedances reported in Tables 7-1A through 7-1C. Review and correct these tables accordingly.
13. Post the WQCC standards and MCLs on Tables 7-2A through 7-2I to facilitate review of the data.
14. Appendix B presents Soil Boring Logs rather than Groundwater Sampling Field Forms. Make the necessary corrections.
15. Indicate depth to water on all figures in Appendix B Soil Boring Logs, if encountered, and in Appendix C on all Monitoring Well Construction Diagrams.

If you have any questions regarding this letter, please contact Mr. Brian Salem of my staff at (505) 222-9576 or at the address indicated in the letterhead of this letter.

Sincerely,



John E. Kieling  
Chief  
Hazardous Waste Bureau

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