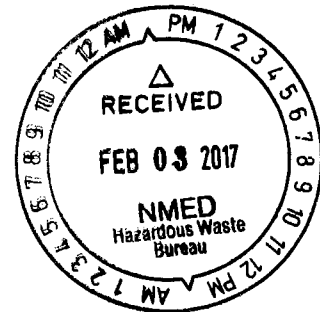


 ENTERED



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



30 January 2017

ADAM M. KUSMAK, GS-13, USAF
Chief, Installation Management Flight (49 CES/CEI)
49th Civil Engineer Squadron (49 CES)
Holloman Air Force Base, NM

New Mexico Environment Department
Attn: Mr. John Kieling, Chief
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6063

Re: **Response to Comments and Revised Final SS-074/TU-912 – Work Plan**
Holloman Air Force Base, Alamogordo, NM
Contract No. W912PP-14-C-0034

Dear Mr. Kieling,

Attached is the *Response to Comments and the Revised Final SS-074/TU-912 – Resource Conservation and Recovery Act Facility Investigation Work Plan* for your records. Included with the hardcopy of the report is a CD that contains native and PDF files of the subject documents including a red-line strikeout version of the Work Plan based on NMED comments dated November 18, 2016.

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 regarding this submittal, please contact me at (575) 572-6675 or by email at adam.kusmak@us.af.mil.

Sincerely,

KUSMAK.ADAM
.M.1263331806

Digitally signed by
KUSMAK.ADAM.M.1263331806
DN: c=US, o=U.S. Government, ou=DoD,
ou=PKI, ou=USAF,
cn=KUSMAK.ADAM.M.1263331806
Date: 2017.02.01 17:49:03 -07'00'

ADAM M. KUSMAK, GS-13, USAF

Attachment(s):

Response to Comments - RCRA Facility Investigation Work Plan for Sites TU912 and SS074, Holloman AFB, New Mexico

Revised Final - Resource Conservation and Recovery Act Facility Investigation Work Plan - SS-074/TU-912. Hard copy and CD.

cc: Mr. Dave Strasser, NMED HWB (w/Atch)
Mr. Cornelius Amindyas, NMED HWB (w/o Atch)
Mr. Chuck Hendrickson, USEPA (w/o Atch)
Mr. Dave Griffin, HAFB (w/Atch)
Mr. Charles Schick, HAFB (w/Atch)
Mr. Brian Renaghan, AFCEC (w/CD only)
Mr. Trent Simpler, USACE (w/CD only)
Mr. Robert Shebuski, CTI (w/CD only)

Response to Comments
RCRA Facility Investigation Work Plan for Sites TU912 and SS074, Holloman AFB, New Mexico

The following Response to Comments has been prepared based on correspondence dated November 18, 2016 by the New Mexico Environment Department (NMED) regarding the RCRA Facility Investigation Work Plan for the above referenced sites. The original comments are provided first followed by a response and a reference in the Work Plan where changes have been incorporated.

Comment 1

Provide a figure that depicts the main base area with the locations of SS-074 and TU-912 clearly marked.

Response 1

A figure depicting Holloman Air Force Base (AFB) and the general locations of SS-074 and TU-912 has been added to the Resource Conservation Recovery Act Facility Investigation (RFI) Work Plan. It has been titled Figure 1 and supplemental figures have been re-number accordingly.

Changes in RFI: Table of Contents, Preface, Section 1.0

Comment 2

The SWMU Assessment Report for site TU-912 (the Building 301 Concrete UST) received by the NMED on November 20, 2013, states that "preliminary coring indicated that soil contamination extends as much as 100 meters from the tank". The Work Pan makes no mention of this possibility. Provide information to document whether or not this assertion is valid and, if so, how this extended area will be characterized.

Response 2

Information provided in the SWMU Assessment Report identifies soil around the former UST as discolored and with a hydrocarbon odor. The surrounding soil was removed so that no visibly stained soil was present however samples collected beneath the former UST exhibited elevated concentrations of total petroleum hydrocarbons (TPH). Information pertaining to "preliminary coring" in the report such as logs and sample results could not be found. As a result, the statement mentioned above is believed to be an estimate. However, it is the intention of the Work Plan design to assess the nature and extent of contamination that resulted from the former leaking UST. In the event that impacts are observed at proposed boring locations, step-out borings will be advance and samples collected for laboratory analysis.

Changes in RFI: Section 3.4 (additional soil borings)

Comment 3

The Work Plan states in several locations that "up to 100 cubic yards of impacted soil may require removal from each site for off-site disposal." Provide a discussion about what will occur should the investigations reveal that more than 100 cubic yards of soil must be removed from one or both of the sites.

Response 3

The RFI Work Plan indicates that excavation may be required at both sites based on investigation findings. The reference to “100 cubic yards” was put in the contract as a placeholder, and should not have been referred to in the Work Plan in such specific terms. Reference to “100 cubic yards” of removal will be modified as appropriate with the following language:

If the findings of the field investigation indicate that an impacted area is present (at either site) and that the area is of limited extent and not complicated by nearby structures, then a voluntary soil removal action prior to submission of the RFI report will be considered. If a large impacted area, or one complicated by nearby structures, is found at either site, the RFI report will recommend that site for evaluation in a Corrective Measures Study (CMS).

Changes in RFI: Preface, Section 1.1 and Section 3.4

Comment 4

Section 1.2 of the Work Plan states that comparison with soil and groundwater screening levels will be conducted in accordance with the NMED guidance document Risk Assessment Guidance for Site Investigation and Remediation, dated December 2014. The Permittee shall utilize the July 2015 version of this document, as updated.

Response 4

The text in the Work Plan has been edited to include the 2015 version of the Guidance Document.

Changes in RFI: Section 1.2 and References.

Comment 5

Section 3.4.2 of the Work Plan. Soil Analytical Testing, indicates that soil samples will be analyzed for "RCRA Metals." Given that the sources of the contamination are essentially unknown, the Permittee must analyze the soil for Target Analyte List (TAL) Metals and add polychlorinated biphenyls (PCBs) to the analytical suite.

Response 5

The Work Plan has been edited to include TAL Metals and PCB analysis of the soils and groundwater. The RCRA Metals analysis has been removed.

Changes in RFI: Section 3.4.3

Comment 6

Section 3.5.10 of the Work Plan, Groundwater Analytical Testing, indicates that groundwater samples will also be analyzed for "RCRA Metals". The Permittee analyze all groundwater samples for TAL Metals and add Total Dissolved Solids and PCBs to the list of analytes.

Response 6

The Work Plan has been edited to include Total Dissolved Solids, polychlorinated biphenyl's, sulfate, nitrate, chlorine and dissolved TAL Metals to the list of analytes for groundwater. The RCRA Metals analysis has been removed.

Changes in RFI: Section 3.5.10

Comment 7

Section 5.3 of the Work Plan, Annual Groundwater Monitoring Reports, states that "brief summaries of the analytical results of quarterly monitoring will be prepared quarterly". This is the first mention of conducting quarterly groundwater monitoring at these sites made in the Work Plan. Provide a separate groundwater monitoring plan that describes the details of the proposed quarterly groundwater monitoring and sampling.

The Permittee must submit a revised Work Plan that addressed the comments included in this Disapproval to NMED no later than February 28, 2017. The submittal must include a response letter that identifies where the changes have been made to the Work Plan. In addition, the Permittee must submit the groundwater monitoring work plan referenced in Comment 7 above no later than January 31, 2017.

Response 7

Reference to four rounds of groundwater sampling was put in the contract as a placeholder, and should not have been referred to in the Work Plan in such specific terms. For this reason, Section 5.3 and other references to "quarterly" groundwater sampling will be deleted from the Work Plan. References to the planned groundwater sampling program will be modified as appropriate with the following language:

Depending on the findings from the initial round, additional rounds of groundwater sampling at either or both sites using the same methods and analytical program described herein will be considered for inclusion in the RFI report. Alternatively, the findings from the initial round may be sufficient for completion of the RFI report, in which case additional rounds of groundwater sampling will not be completed.

A separate groundwater monitoring plan that describes the details of the proposed quarterly groundwater monitoring and sampling will not be submitted. All groundwater sampling details for the sites are contained in the Work Plan.

Changes in RFI: Preface, Section 1.1 Section 3.5.5



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.env.nm.gov



BUTCH TONGATE
Cabinet Secretary-Designate

J.C. BORREGO
Acting Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 18, 2016

Mr. Adam Kusmak
Chief, Installation Flight Management
49th CES/CEI
550 Tabosa Avenue
Holloman AFB, NM 88330

**RE: DISAPPROVAL
FINAL RESOURCE CONSERVATION AND RECOVERY ACT FACILITY
INVESTIGATION WORK PLAN, SS-074 AND TU-912, APRIL 2016
HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422
HWB-HAFB-16-009**

Dear Mr. Kusmak:

The New Mexico Environment Department (NMED) has reviewed the above referenced document (the Work Plan) submitted by Holloman Air Force Base (the Permittee) on May 5, 2016. NMED hereby issues this Disapproval with the following comments.

Comment 1

Provide a figure that depicts the main base area with the locations of SS-074 and TU-912 clearly marked.

Comment 2

The *SWMU Assessment Report* for site TU-912 (the Building 301 Concrete UST), received by the NMED on November 20, 2013, states that “[p]reliminary coring indicated that soil contamination extends as much as 100 meters from the tank”. The Work Plan makes no mention of this possibility. Provide information to document whether or not this assertion is valid and, if so, how this extended area will be characterized.

Comment 3

The Work Plan states in several locations that “up to 100 cubic yards of impacted soil may require removal from each site for off-site disposal.” Provide a discussion about what will occur should the investigations reveal that more than 100 cubic yards of soil must be removed from one or both of the sites.

Comment 4

Section 1.2 of the Work Plan states that comparisons with soil and groundwater screening levels will be conducted in accordance with the NMED guidance document *Risk Assessment Guidance for Site Investigations and Remediation*, dated December 2014. The Permittee shall utilize the July 2015 version of this document, as updated.

Comment 5

Section 3.4.2 of the Work Plan, Soil Analytical Testing, indicates that soil samples will be analyzed for “RCRA Metals.” Given that the sources of the contamination are essentially unknown, the Permittee must analyze the soil for Target Analyte List (TAL) Metals and add polychlorinated biphenyls (PCBs) to the analytical suite.

Comment 6

Section 3.5.10 of the Work Plan, Groundwater Analytical Testing, indicates that groundwater samples will also be analyzed for “RCRA Metals”. The Permittee shall analyze all groundwater samples for TAL Metals and add Total Dissolved Solids and PCBs to the list of analytes.

Comment 7

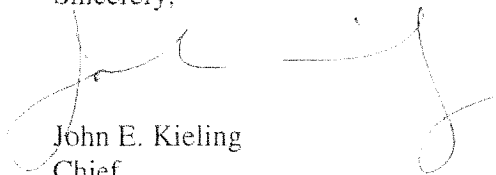
Section 5.3 of the Work Plan, Annual Groundwater Monitoring Reports, states that “[b]rief summaries of the analytical results of quarterly monitoring will be prepared quarterly”. This is the first mention of conducting quarterly groundwater monitoring at these sites made in the Work Plan. Provide a separate groundwater monitoring plan that describes the details of the proposed quarterly groundwater monitoring and sampling.

The Permittee must submit a revised Work Plan that addressed the comments included in this Disapproval to NMED no later than **February 28, 2017**. The submittal must include a response letter that identifies where the changes have been made to the Work Plan. In addition, the Permittee must submit the groundwater monitoring work plan referenced in Comment 7 above no later than **January 31, 2017**.

Mr. Adam Kusmak
November 18, 2016
Page 3 of 3

If you have any questions regarding this letter, 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
C. Amindyas, NMED HWB
D. Strasser, NMED HWB
C. Schick, HAFB
D. Griffin, HAFB
C. Hendrickson, EPA, Region 6 (6MM-RC)
L. King, EPA, Region 6 (6MM-RC)

File: HAFB 2016 and Reading
HAFB-16-009