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State of New Mexico  **ENTERED**
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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

June 29, 2017

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

**RE: APPROVAL WITH MODIFICATION
RESPONSE TO THE NOTICE OF DISAPPROVAL FOR THE SR859A FORMER
SKEET RANGE 2 AND TS862A JEEP TARGET AREA SKEET RANGE
REMEDIAL INVESTIGATION REPORT, APRIL 2016
HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422
HWB-HAFB-16-003**

Dear Mr. Kusmak:

The New Mexico Environment Department (NMED) has reviewed the Holloman Air Force Base (Permittee) March 14, 2017 response to NMED's Notice of Disapproval (NOD) dated November 7, 2016 for the above referenced Remedial Investigation Report (RI Report). NMED hereby approves the RI Report with modification as the subject response does not adequately address NMED's comments presented in the NOD, as discussed below.

The report for a Phase II Comprehensive Site Evaluation (CSE) conducted in 2013 at both Munitions Response Areas (SR859 [now designated as AOC TS-859 and AOC TS-862]) recommended splitting each of them into two sites: TS859 (34.3 acres) and TS859a (8 acres) and TS862 (34.6 acres) and TS862a (5.7 acres). This was recommended based on the perceived lack of Munitions Constituents (MCs) exceeding regulatory screening levels at the larger sites (AOC TS-859 and AOC TS-862). These sites were recommended for No Further Action (NFA) [Corrective Action Complete (CAC)] in the Phase II CSE Report. CAC status was not approved by the NMED because the Phase II CSE Report was not provided for review. The smaller sites (TS859a and TS862a) were recommended for future response actions due to the presence of

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MCs (lead and polycyclic aromatic hydrocarbons [PAHs]) in soil that exceed NMED soil screening levels. The proposed response included soil, lead shot, and clay target debris removal and disposal and post-excavation confirmation sampling.

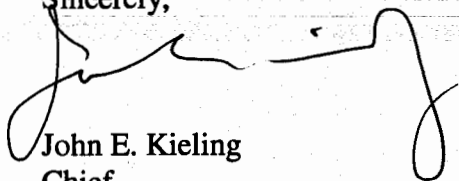
NMED approves the recommendations in the RI Report for the smaller sites. However, the response to the NOD still supports the RI Report's recommendation that no further response actions are required for the larger sites. NMED continues to disagree with this recommendation. Figures 4 and 7 of the RI Report (*Visual Reconnaissance Results*) and a walkover of both AOCs conducted on July 30, 2015 by NMED and base environmental staff confirm that lead shot (a potential risk to ecological and human receptors) and clay target debris (a source of PAH contamination) are scattered throughout both AOC TS-859 and AOC TS-862. The presence of lead shot and PAH-containing clay target debris has clearly been recognized in the RI Report. What is not recognized are the potential health risks to human and ecological receptors presented by the actual presence of the shot and target debris.

In its response to the NOD, the Permittee states that "to include the areas associated with TS859 and TS862 MRSs which have been approved for NFA during the CSE Phase II are outside the scope of work for this contract". NMED has not granted CAC status to AOC TS-859 or AOC TS-862, nor the sites designated as TS859a or TS862a (which are included in AOC TS-859 and AOC TS-862, respectively). Therefore, the sites will remain on the list of Solid Waste Management Units/Areas of Concern (SWMU/AOCs) in the Hazardous Waste Facility Operating Permit (the Permit) that identifies SWMUs/AOCs Requiring Correction Action (i.e., Table A of Permit Part 4, Appendix 4-A). The entirety of AOCs TS-859 and TS-862 will remain on Table A until the Permittee can demonstrate with certainty that the lead shot and clay target debris and residual soil contamination do not pose potential health risks to human and ecological receptors.

The Permittee has advised NMED that a Non-Time Critical Removal Action (NTCRA) Work Plan will be submitted for continued remedial activities at the portions of AOCs TS-859 and TS-862 designated as TS859a and TS862a, respectively. The Permittee shall include a proposal for further investigation and/or remedial actions for the entirety of AOCs TS-859 and TS-862 in the Work Plan, which must be submitted by **October 31, 2017**.

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

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