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State of New Mexico
ENVIRONMENT DEPARTMENT

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ENTERED



BUTCH TONGATE
Cabinet Secretary

J. C. BORREGO
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 14, 2017

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

**RE: DISAPPROVAL
MULTI-SITE RCRA FACILITY INVESTIGATION WORK PLAN
ADDENDUM, MARCH 2017
HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422
HWB-HAFB-14-003**

Dear Mr. Kusmak:

The New Mexico Environment Department (NMED) has reviewed the above referenced document (Work Plan Addendum) submitted by Holloman Air Force Base (Permittee) on March 31, 2017. NMED hereby issues this Disapproval with the following comments.

1. **Page 4-1, Section 4.1**

This Section references the use of NMED's *Technical Background Document for Development of Soil Screening Levels (SSLs)* (NMED, 2012, 2015) and *Assessing Human Health Risks Posed by Chemicals: Screening Level Risk Assessment* (NMED, 2000) as guidance in developing soil screening levels. This guidance has been superseded by NMED's March 2017 *Risk Assessment Guidance for Site Investigations and Remediation*. This Section (4.1) must be revised to indicate the use of the current guidance. In addition, the Permittee must provide a statement in this Section that all soil and groundwater analytical results for metals will be compared against the approved base-wide background levels (NMED, March 2012), as well as against the applicable screening levels.

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2. **Page 4-3, Section 4.2, Item #6 and Page 3, Section 2, Item #6 of Appendix B, of the Sampling and Analysis Plan (SAP)**

These Sections propose the installation of monitoring wells to a depth of 30 feet below ground surface (bgs). The Permittee shall revise these Sections to indicate that, if groundwater is not encountered at 30 feet bgs, the wells will be installed to a maximum depth of 40 feet bgs.

3. **Page 4-4, Section 4.2, Items #8 and #12 and Page 4, Section 2, Items #8 and #12 of the SAP**

The Permittee shall revise these Sections to include polychlorinated biphenyls (PCBs) in the list of analytes for soil and groundwater

4. **Page 3, Section 2 and Figures B-2, B-3 and B-4 of the SAP**

The Permittee shall revise this Section and these Figures to include the drilling of a borehole and installation of a monitoring well through the leachfields at all three sites, including soil and groundwater sampling and analysis as proposed. In addition, the Permittee must include the placement of a soil boring and monitoring well along the effluent line adjacent to Building 1178, as shown on Figure B-2, as it was a former industrial shop.

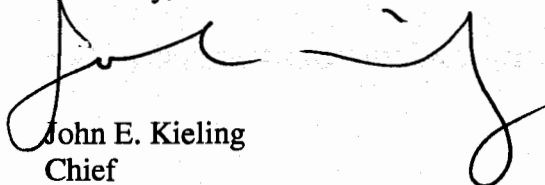
5. **All Site Location Figures**

The Permittee shall revise all figures provided in Work Plan Addendum/SAP to show a coordinate system (i.e., State Plane, UTM, latitude/longitude).

The Permittee must submit a revised Work Plan Addendum that addresses the comments included in this Disapproval to NMED no later than **September 29, 2017**. The submittal must include a response letter that identifies where the changes have been made to the Work Plan Addendum and an electronic redline-strikeout version showing where all changes to the Work Plan Addendum have been made. Electronic files (e.g. Microsoft Word®) of the submittal must be included.

Please call David Strasser of my staff at (505) 222-9526, if you have questions regarding this letter.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

Mr. Adam Kusmak

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cc: D. Cobrain, NMED HWB
C. Amindyas, NMED HWB
D. Strasser, NMED HWB
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