



HAFB Skeet Ranges
AOC-859
AOC-862

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Transmitted via e-mail

September 18, 2018

Mr. Adam M. Kusmak
Chief, Installation Management Flight (49 CES/CEI)
49th Civil Engineer Squadron (49 CES)
Holloman Air Force Base, NM

RE: SR859a Former Skeet Range 2 and TS862a Jeep Target Area Skeet Range Engineering Evaluation / Cost Analysis, Holloman Air Force Base, New Mexico, EPA I.D. # NM6572124422

Mr. Kusmak:

EPA has reviewed this document, dated August 2018, for these two MRS (Munitions Response Sites), SR859a and TS862a. EPA does not concur with the submittal, as detailed in the following comments:

- 1) Section 1.1, Authority: "The USAF is the lead agency for this EE/CA. Federal, state, and local authorities and the local public will be solicited for their input and comment for the duration of proposed activities and for all environmental restoration activities at Holloman AFB." This report fails to note that these sites are subject to the requirements of Holloman Air Force Base's (HAFB) RCRA permit issued by the New Mexico Environment Department (NMED). These two sites have been designated as AOC-859 and AOC-862 in that permit. Closeout of these sites are subject to NMED's authority. This text and Section 3.2, on ARARs, should be corrected to include this information.
- 2) Section 1.2, Purpose and Scope: The stated purpose is limited to evaluation related only to PAH contamination. As noted in previous EPA comments, contamination of lead (Pb) shot on these sites also needs appropriate evaluation. The vast majority of this Pb shot contamination has been ignored by HAFB to date, apparently based upon faulty sampling procedures followed by conclusions that have blinders to the documented reality of this Pb contamination. The related larger MRS SR859 and TS862 have this same issue, as detailed in previous EPA comments. Of note, former skeet range TS851 also has this issue. Remediation of only some of these sites' contamination will not enable the sites to be closed out with the UU/UE designation desired by HAFB.
- 3) Surface masses of PAH-containing clay target debris (CTD) are mapped beyond the designated boundaries of SR859a, as well as finds of CTD mapped across large areas downrange at both former ranges. This EE/CA apparently intends to leave much or all of this waste contamination on the ground without further consideration, resulting in incomplete remediation.

4) Section 4.1.4, Onsite Ex-Situ Treatment of Soils alternative: EPA stated multiple concerns with this remediation method related to site lead shot in comments to Mr. Scott Clark dated 28 August, 2017; EPA has received no response from HAFB that addresses those concerns.

5) Section 6.1, Remedial Action Scope: “The area that will be excavated will extended laterally and vertically until confirmation results are below the cleanup levels for lead and PAHs in soil.” EPA has concerns that confirmation sampling methods could produce results as unrepresentative of site conditions as those from previous investigations. The sampling and analytical methods need to be clearly described in the planned NCTRA work plan. Further, regardless of underlying soil contaminant levels, the great majority of the PAH-bearing CTD and skeet shot wastes need to be removed from site soils.

Should you have any questions about this letter, please contact me at (214) 665-2196 or hendrickson.charles@epa.gov.

Sincerely Yours,

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