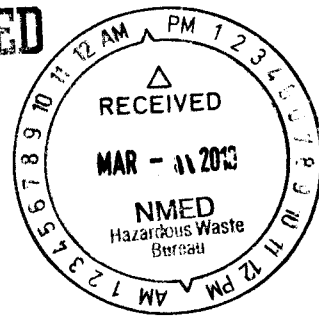




DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 49TH WING (AETC)
HOLLOMAN AIR FORCE BASE NEW MEXICO



RECEIVED



21 February 2019

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 – Approval with Modifications Letter (January 24, 2019), Final DP030/SD033 (Solid Waste Management Unit 113B) Interim Corrective Measures Report, July 2018, Holloman Air Force Base, New Mexico, January 2019 Holloman AFB, EPA ID# NM6572124422, HWB-HAFB-15-009 Contract No. FA8903-13-C-0008**

Dear Mr. Kieling,

Holloman Air Force Base (AFB) is pleased to submit the Response to Comments in reference to the Approval with Modifications Letter (January 24, 2019) for the Final DP030/SD033 (Solid Waste Management Unit 113B) Interim Corrective Measures Report, July 2018.

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,

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ADAM M. KUSMAK, GS-13, USAF

Attachment(s): *Response to Comments – Approval with Modifications Letter (January 24, 2019), Final DP030/SD033 (Solid Waste Management Unit 113B) Interim Corrective Measures Report, July 2018, Holloman Air Force Base, New Mexico, January 2019 Fuel Spill (AOC Q . Hard copy and CD.*

cc: Mr. David Strasser, NMED HWB (w/Atch)
Mr. Cornelius Amindyas, NMED HWB (w/o Atch)
Mr. Chuck Hendrickson, USEPA (w/CD)
Mr. James (Scott) Dorton, HAFB (w/Atch)
Mr. Charles Schick, HAFB (w/Atch)
Ms. Robin Paul, AFCEC (w/CD)
Mr. Madison Knopp, AGEISS (w/CD)

Comment	Reviewer	Page	Paragraph/Sect	Comment	Response/Resolution (URS)
1	NMED	Gen	Section 6	<p>Section 6.0 of the Report, Conclusions and Recommendations, recommended that no further action be required at Solid Waste Management Unit (SWMU) 113B and that it be granted Corrective Action Complete (CAC) without controls status. However, both Section 4.5 of the Report, Groundwater Analytical Results Conclusion, and the Fiscal Year 2017 Groundwater Monitoring Report, Sites DP030/SD033 recommended, based on the current and historical groundwater results for the site, that annual monitoring of the groundwater contaminant plume continue until trichloroethylene (TCE) concentrations in all monitoring wells are below the action level.</p>	<p>Comment acknowledged. The referenced sentence of Section 4.5, which recommended continued LTM based on TCE concentrations was an inadvertent remnant from a previous report that was errantly left in the Interim Corrective Measures Report (ICMR). Additionally, the recommendations provided in the FY 2017 Groundwater Monitoring Report have been overcome by subsequent events, primarily the vapor sampling and risk evaluation for vapor intrusion (Sections 4.3 and 5.2.3 of the ICMR) . URS installed and sampled vapor wells to evaluate the only potential risk pathway related to TCE in groundwater at the Site, since, as described in the ICMR, TDS levels render it a non-protectable resource for potable water under New Mexico and federal regulations. The vapor sampling conducted has demonstrated that there is no complete risk pathway for TCE in groundwater.</p> <p>Based on the information and risk assessment provided in the report, we respectfully again request CAC <i>without Controls</i> and termination of LTM at the Site. This is the equivalent approach of using the provisions of Appendix 4-F, Section VII "Risk-Based Variance from Cleanup Standards or Levels", as described in the current Holloman Air Force Base Hazardous Waste Facility Permit (No. NM6572124422), whereby the current levels of TCE in groundwater represent "alternative cleanup levels" in groundwater.</p> <p>It is further recommended that the first sentence of Section 4.5 can be deleted, and that an updated replacement sheet can be provided.</p>