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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

FEB 21 2020

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

RE: **DISAPPROVAL**
FINAL INTERIM MEASURES REPORT, OD20K 20,000-POUND OPEN DETONATION UNIT,
SOLID WASTE MANAGEMENT UNIT 168, AUGUST 2019
HOLLOMAN AFB, EPA ID #NM6572124422
HWB-HAFB-19-015

Dear Mr. Kusmak:

The New Mexico Environment Department (NMED) has reviewed the above referenced Interim Measures Report (Report) received from Holloman Air Force Base (Permittee) on August 22, 2019. The NMED hereby issues this Disapproval of the Report. The Permittee must address the following comments.

1. **Executive Summary, Page 2 and Section 4.0, Page 4-1, Conclusions:** These sections state that the action level for perchlorate in groundwater, 15 micrograms per liter ($\mu\text{g/L}$), is the Environmental Protections Agency (EPA) "interim health advisory level." As of November 2018, 15 $\mu\text{g/L}$ is the EPA Maximum Contaminant Level (MCL).

Revise the Report to correct the reference.

2. **Section 2.2.1, Page 2-2, March 2015 DGI:** This section indicates that during the March 2015 data gap investigation, nitrate was detected in the groundwater from monitoring well OD20K-MW02 in excess of the EPA MCL (10 milligrams per liter[mg/L]) at 28.3 mg/L. NMED notes that during the August 2012 sampling event, the nitrate concentration in this

well was 30 mg/L. This nitrate exceedance is not addressed in the Report because it was not included in the interim measure's April 2019 groundwater sampling event.

Revise the Report to discuss nitrate concentrations in groundwater and to indicate that nitrate analysis will be conducted for groundwater samples collected during future sampling events, as required in the Interim Measures Work Plan specified in comment #4 below.

3. **Section 3.7.2, Page 3-6, Groundwater Sampling Results, Figure 3-8 and Table 3-3:** This section, figure and table present the analytical results for perchlorate in groundwater from newly installed monitoring wells OD20K-MW13, OD20K-MW14, OD20K-MW15 and OD20K-MW16, which were sampled during the interim measure activities on April 11, 2019. The laboratory reports provided in Appendix C of the Report, particularly Job Number FA63295, indicate that existing monitoring wells OD20K-MW02, OD20K-MW06, OD20K-MW08 and OD20K-MW11 were also tested for perchlorate on April 11, 2019. These results are not presented in Section 3.7.2 nor Table 3-3, nor are they shown on Figure 3-8. All four of the existing wells contained concentrations of perchlorate in excess of the MCL, ranging from 51.3 µg/L to 1710 µg/L. These results are considerably higher than the results from the 2017 sampling event, as shown on Figure 2-6 of the Report.

Revise the Report to present the results of perchlorate and total dissolved solids in groundwater from all wells sampled on April 11, 2019. Figure 3-8 must be revised to depict the perchlorate contaminant plume integrating the new monitoring well results with the existing well sample analytical results.

4. **Section 4.0, Conclusions:** There are two issues related to this section:

- a. NMED has determined that the extent of perchlorate contamination in groundwater to the west/southwest of new monitoring wells OD20K-MW14 and OD20K-MW15 has not been fully delineated. The Report does not address this conclusion.
- b. The Report presented investigation conclusions but did not provide any specific recommendations, other than "remediation of groundwater is necessary to address increased levels of perchlorate in groundwater". In accordance with the Open Detonation Treatment Unit Permit, Attachment F, *Closure Plan*, the Permittee is required to submit an Interim Measures Work Plan to NMED for remediation of perchlorate-contaminated groundwater.

Revise the Report as follows:

- a. Present the conclusion that the west/southwesterly extent of perchlorate

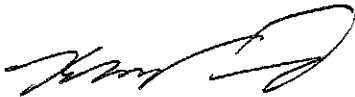
contamination in groundwater has not been fully delineated, and

- b. Provide a recommendation for the submission of an Interim Measures Work Plan for continued corrective action at the site, including proposing further characterization of the westerly extent of perchlorate contamination in groundwater and the inclusion of sampling for nitrate in future groundwater samples.

The Permittee must submit a revised Interim Measures Report that addresses all comments contained in this Disapproval. In addition, the Permittee must include a response letter that cross-references where NMED's numbered comments were addressed. The Permittee must also submit an electronic redline-strikeout version of the revised Report showing where all changes have been made to the Report. The revised Report must be submitted no later than **May 29, 2020**.

If you have any questions regarding this letter, please contact Mr. David Strasser of my staff at (505) 222-9526.

Sincerely,



Kevin Pierard
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
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