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Certified Mail - Return Receipt Requested



September 27, 2023

Mr. James Scott Dorton
Chief, Environmental Compliance and Conservation
550 Tabosa Avenue
Holloman AFB, NM 88330

**RE: DISAPPROVAL
FINAL FISCAL YEAR 2023 GROUNDWATER MONITORING REPORT SS018 - VOC SPILL
SITE (AOC-H), AUGUST 2023
HOLLOMAN AIR FORCE BASE
EPA ID # NM6572124422
HWB-HAFB-23-006**

Dear Mr. Dorton,

The New Mexico Environment Department (NMED) received the U.S. Air Force (Permittee) Holloman Air Force Base (Facility) *Final Fiscal Year 2023 Groundwater Monitoring Report SS018 - VOC Spill Site (AOC-H), August 2023*, (Report) on August 14, 2023. NMED has reviewed the Report and hereby issues this Disapproval with the following comment:

GENERAL COMMENT

1. MONITORING WELL SAMPLE PROCEDURE

NMED Comment: Table 4-1 and the Field Purge and Sample Forms in Appendix C of the Report indicate that fifteen monitoring wells (SS18-MW02, SS18-MW04, SS18-MW09, SS18-MW10, SS18-MW11, SS18-MW12, SS18-MW13, SS18-MW14, SS18-MW15, SS18-MW16, SS18-MW17, SS18-MW18, SS18-MW19, SS18-MW20, and SS18-MW22) were sampled without purging due to an insufficient amount of water in the water column. The Permittee must follow the *Final Long-Term Groundwater Monitoring Plan SS018 - VOC Spill Site (AOC-H), Revision 1, February 2023 (Work Plan)*, approved by NMED on May 10, 2023, or other established monitoring well sampling techniques, such as those described in *Use of Low-Flow and Other Non-Traditional Sampling Techniques for RCRA Compliant Groundwater Monitoring*, which can be found at https://www.env.nm.gov/hazardous-waste/wp-content/uploads/sites/10/2023/08/11-7low-flow_final.pdf, or get NMED approval prior to deviating from the approved Work

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Plan. The Permittee is reminded that sampling stagnated groundwater will not produce groundwater samples that are characteristic of local aquifer conditions.

In the future, ensure that all monitoring wells are fully purged; if a well has insufficient well column to purge, either fully purge the well and sample after the well recovers or use a low flow sampling technique. Additionally, in future monitoring reports, if there are monitoring wells with insufficient water for a complete purge, include a discussion in the monitoring report detailing the purging and sampling activities, or indicate that a low flow sampling method was used.

Because so many monitoring wells were improperly sampled during the March 2023 sampling event (15 out of 35), the Permittee is required to complete another sampling event in accordance with the approved Work Plan as soon as possible to ensure that accurate groundwater data is obtained for 2023. An additional monitoring report for SS018 must be submitted to NMED **by February 29, 2024**.

If you have any questions regarding this letter, please contact Naomi Davidson at (505) 690-7567.

Sincerely,

Ricardo Maestas

Digitally signed by Ricardo
Maestas
Date: 2023.09.27 08:22:03 -06'00'

Ricardo Maestas
Acting Chief
Hazardous Waste Bureau

cc: N. Dhawan, NMED HWB
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