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DELISTING ACTION - STATUS OF HOLLOMAN AIR FORCE BASE

JUL 31 1987

MEMORANDUM

SUBJECT: Status of Holloman Air Force Base Delisting Action

FROM: Marcia Williams, Director  
Office of Solid Wastes (WH-562)

TO: Allyn M Davis, Director  
Hazardous Waste Management Division (6H)  
Region VI

In your memorandum of June 6, 1987, you inquired about the status of the Holloman Air Force Base (HAFB) petition to delist the waste contained in seven impoundments and two lakes. Specifically, you requested the status of policy issues that have been raised during the review of HAFB's preliminary characterization of the wastes. You were primarily concerned with the amount of sampling that would be required by the Delisting Program for proper characterization of the waste. In response to your memorandum, my staff has completed a chronology of meetings between HAFB and EPA representatives and outlined the progress that has been made concerning the major outstanding issues that were discussed at these meetings.

EPA and Air Force representatives have met three times to discuss delisting options and issues for their treatment train system. The impoundment train, which was established to treat the base's domestic sewage, also received hazardous wastes. Therefore, under the "mixture rule" (40 CFR 261.3(b) (2)), the waste contained in the seven impoundments, Lake Holloman, and Lake Stinky is considered to be hazardous.

At the first meeting on August 29, 1986, Air Force officials submitted background information and preliminary sampling data. EPA and Air Force representatives met again in November 1986 to discuss the results of the EPA evaluation of the information that was submitted at the August meeting. The meeting focused on the additional data that would be needed to complete the delisting petition. Three major issues were discussed at this

meeting: sampling requirements; analytical requirements; and ground water monitoring needs.

Sampling:

Air Force officials were informed that to properly characterize the waste and evaluate its uniformity and variability, delisting policy would require the collection and analysis of over 1600 composite samples (439 of impoundment sludge, 439 of impoundment liquid, 723 of lake water and soils).

In addition, they were informed that, generally, any delisting decision is based on the maximum detected concentrations of hazardous constituents for which the waste is analyzed. However, a mean concentration value may be used if a sufficient number of samples is collected, but this approach would greatly increase the number of samples required for characterization.

Analytical:

Air Force Officials were informed that they would have to analyze each composite for all Appendix VIII constituents in order to fully characterize the waste as required under the Hazardous and Solid Waste Amendments of 1984. Petitioners can deviate from this requirement only if they can input information that certain Appendix VIII constituents cannot be present in the waste. Air Force officials were concerned that their records could not support such a deviation from the requirements.

Groundwater:

Air Force officials were informed that a complete delisting petition should include four quarters of groundwater monitoring data from a system that had been inspected and approved by EPA Region VI authorities.

The meeting concluded with the understanding that Air Force officials would evaluate this information and decide whether to pursue a delisting.

The third meeting between EPA and Air Force representatives on February 6, 1987 focused on Air Force requests for possible

allowances to delisting sampling and analytical requirements due to the large volume of waste involved. EPA was not encouraging but agreed to reevaluate the issue.

We understand that in June, based on telephone communications with delisting staff, Will Focht (Formerly of Region VI) informed Air Force officials that the EPA was still evaluating the remaining outstanding issues regarding delisting a portion of the treatment train, removal of hot spots, and more lenient sampling and testing requirements. In addition, it is our understanding that Holloman officials will delay submitting a formal petition pending resolution of these issues.

The present status of each of these issues follows:

#### Delisting Portions of Treatment Trains

At the February meeting, Air Force officials were informed that only the entire treatment train, not portions of it, could be subject to delisting. The Air Force believes that contamination of one impoundment in a treatment train does not imply contamination of all impoundments in that train. Thus, even though two of the impoundments are showing PCB contamination, they believe that the remaining five impoundments and two lakes should be delisted if they meet all of the Agency's delisting criteria.

We are reevaluating this issue and have not yet reached a resolution. We will inform you of our decision as soon as possible.

#### Hot Spot Removal

A final decision has not yet been reached concerning the Air Force's request to remove "hot spots" from the two contaminated impoundments and eliminate from consideration the failing samples that were collected from this area. Holloman officials believe that if these samples are not considered, that all seven impoundments will meet delisting standards.

#### Sampling and Analytical Requirements

EPA has reevaluated the Air Force's request to reduce the

number of samples to be taken for analysis and agrees that the large size of the impoundments and lakes in question warrants a departure from standard procedure. A statistically valid characterization of these impoundment wastes may be achieved with a fewer number of samples. We are developing guidelines for a sampling approach that would be appropriate for the Holloman situation and hope to reduce the number of samples required.

EPA will continue to require a full Appendix VIII analysis of all samples since a complete history of the chemicals disposed in the area is not available. As noted previously, this complete analysis will be required to ensure that all hazardous constituents that have been disposed in the impoundments are properly characterized. The background information and preliminary sampling data illustrate several inconsistencies in the Air Force's disposal records; for example, there is no mention of transformer oil disposal in the impoundments, however, the waste is contaminated with PCB's and 1,2,4-trichlorobenzene, two constituents commonly found in transformer oils.

We understand that our decisions on the Holloman situation may potentially affect your negotiations with Holloman. However, we must proceed carefully to ensure that our delisting decision considers all pertinent factors and maximizes protection of the environment. We hope to resolve these issues soon and will keep you informed of our progress.

If you have any questions, please contact Suzanne Rudzinski (202) 382-4206, of my staff.