January 31, 2013

A. David Budak
Deputy Base Civil Engineer
49 CES/CEVR
550 Tabosa Avenue
Holloman AFB, NM 88330-8458

RE: APPROVAL WITH MODIFICATIONS
NITRATE CHARACTERIZATION STUDY WORK PLAN, JANUARY 2012
HOLLOMAN AIR FORCE BASE, EPA ID# NM6572124422
HWB-HAFB-12-003

Dear Mr. Budak:

The New Mexico Environment Department (NMED) has reviewed the Holloman Air Force Base (the Permittee) Nitrate Characterization Study Work Plan (Work Plan), which was received on January 23, 2012. The NMED hereby approves the Work Plan with the following modifications and comments:

1. Section 3.4.3, page 3-4, last paragraph – The first sentence of this paragraph states that “[i]f 90% to 99% of the measurements in the data set are non-detects, statistical analysis is not possible and the UTL value will be set at 2 times the maximum detected value.” Because it is possible that a maximum detected value could be of an unexpected magnitude compared to other background conditions in New Mexico, and therefore not be truly representative of natural conditions or the expected range of natural conditions. NMED may not accept results computed at two times or greater than the maximum detected value for such data sets.
2. During the Source Area investigations, the Permittee shall determine and report on the approximate rate of migration of any nitrate contamination detected in ground water at all sites.

3. The Permittee shall ensure that ground water is analyzed as dissolved (filtered) samples.

4. All submittals must be in the form of two paper copies and one electronic copy (with all data in MS Excel™ format).

If you have any questions regarding this matter, please contact David Strasser at (505) 222-9526.

Sincerely,

John E. Kieling
Chief
Hazardous Waste Bureau

cc: W. Moats, NMED HWB  
C. Amindyas, NMED HWB  
B. Salem, NMED HWB  
D. Strasser, NMED HWB  
B. Hunt, HAFB  
C. Hendrickson, EPA, Region 6 (6PD-F)  
File: HAFB 2013 and Reading  
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