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RYAN FLYNN  
Cabinet Secretary  
BUTCH TONGATE  
Deputy Secretary

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

April 9, 2015

Ms. DeAnna Rothhaupt  
Chief, Holloman AFB Environmental  
49 CES/CEIE  
550 Tabosa Avenue  
Holloman AFB, NM 88330-8261

**RE: DISAPPROVAL  
RESPONSE TO COMMENTS TO THE MARCH 25, 2013 NOTICE OF  
DISAPPROVAL FOR THE VOLUNTARY CORRECTIVE MEASURES  
REQUEST FOR SEPTIC SITES, JANUARY 2012  
HOLLOMAN AIR FORCE BASE, EPA ID # NM6572124422  
HWB-HAFB-12-002**

Dear Ms. Rothhaupt:

The New Mexico Environment Department (NMED) has reviewed the Holloman Air Force Base (Permittee) response to the NMED's March 25, 2013 Notice of Disapproval (NOD) for the January 2012 Voluntary Corrective Measure Request (VCM Work Plan). NMED hereby issues this Disapproval for the reason discussed below.

**Response to Comment #4**

In this comment, NMED requested that all soil and ground water samples collected at the septic sites be analyzed for nitrate. The Permittee's response was as follows: "Please note that at the time of receipt of the NOD the RFI investigation had already been performed in general accordance with the RFI Work Plan for Basewide Septic Tanks (URS, 2009) and approved by the NMED on January 13, 2010 which did not include analysis for nitrate in soil and groundwater samples". A cursory review of the RFI investigation reports for the septic sites reveals that neither soil nor ground water samples were analyzed for nitrate.

NMED concedes that the October 2009 RFI Work Plan, which was approved by NMED, did not include a requirement for analysis of soil or ground water for nitrate. However, this was an obvious over-sight as standard procedures for investigating potential releases

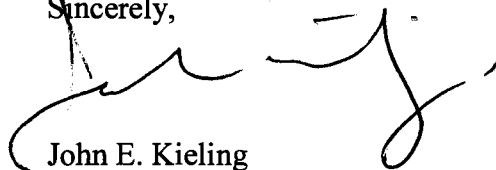
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from septic sites include the analysis of soil and ground water for nitrate. It is NMED's contention that the January 2012 VCM Work Plan superseded the 2009 RFI Work Plan and that the Permittee commenced investigation activities at the septic sites prior to receipt of NMED's approval of the VCM Work Plan.

Therefore, the Permittee is required to collect ground water samples from the monitoring wells installed at the septic sites that were the subject of the Work Plan and analyze them for nitrate. The Permittee shall submit the results of this analysis to NMED on or before **July 8, 2015** in the form of two paper copies and one electronic copy (in MS Word/EXCEL™ format).

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

Sincerely,



John E. Kieling  
Chief  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
W. Moats, NMED HWB  
C. Amindyas, NMED HWB  
D. Strasser, NMED HWB  
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File: HAFB 2015 and Reading  
HAFB-12-002