



DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS 49TH WING (ACC)  
HOLLOMAN AIR FORCE BASE NEW MEXICO

 **ENTERED**

2 May 2018

ADAM M. KUSMAK, GS-13, USAF  
Chief, Installation Management Flight (49 CES/CEI)  
49th Civil Engineer Squadron (49 CES)  
Holloman Air Force Base, NM

New Mexico Environment Department  
Attn: Mr. John Kieling, Chief  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505-6063

**Re: Request for Withdrawal: Nitrate Characterization Study.**

Dear Mr. Kieling:

Holloman AFB is requesting to withdraw the Nitrate Characterization Study dated January 2014. Originally, this study was designed in response to NMED's rejection of the original Base-wide Background Study (December 2009 and finalized March 2012 with values issued by NMED correspondence) for multiple analytes in soil and groundwater where the calculated value for nitrate was 126.74 mg/L. NMED rejected the 2009 background study value for nitrate because it was above the NM WQCC value of 10 mg/L and NMED believed there were two populations of nitrate across the base.

Holloman, with consultation of the NMED HWB submitted a work plan for the present nitrate characterization study with sampling locations and methods approved by NMED to resolve any issues of multiple populations. The subject report provided a background value of 37.7mg/L. The current reports calculated background concentration for nitrate was nearly three times lower than the original study. Never-the-less, NMED again rejected the study because the 37.7 mg/L value was above the 10mg/L NMQQCC standard.

NMED has directed Holloman to collect more samples for perchlorate and isotopic analyses of oxygen and nitrogen and repair Figure 2-8 of the report which contains a transposed water level elevation. The NODs suggest that additional data might indicate anthropogenic sources of elevated nitrate and ignoring the obvious possibility that nitrates, and other constituents such as total dissolved solids are documented to be high in closed bolson of the Tularosa Basin. The NODs also suggest that several locations with septic tanks may be contributing nitrates to groundwater. The septic tanks sites in question have been characterized or are presently being



characterized for nitrates and other constituents and do not appear to be contributors to nitrate in the groundwater.

Holloman will withdraw the nitrate study at this time. Holloman and will continue to address nitrates in groundwater at ongoing corrective action sites on a case-by-case basis using the AFCEC performance-based remediation contractors. This approach appears to be working well and therefore, determining a background value for nitrate does not appear to be necessary at this time.

If you have any questions regarding this submittal, please contact me at (575) 572-6675.

Sincerely,

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**ADAM M. KUSMAK, GS-I3, USAF**

cc: D. Strasser, NMED  
C. Schick, HAFB  
S. Dorton, HAFB  
R. Paul, AFCEC CZO