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TONEY ANAYA
GOVERNOR

DENISE D. FORT
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STATE OF NEW MEXICO

ENVIRONMENTAL IMPROVEMENT DIVISION

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CAFB
CO/SC ROD

July 3, 1985

NOTICE OF DEFICIENCY
CERTIFIED MAIL-RETURN RECEIPT REQUESTED

V

Mary N. Turner, Colonel, U.S.A.F.
Commander
Headquarters 27th Combat Support Group (TAC)
Cannon Air Force Base, New Mexico 87101

Re: Part B
NM7572124454

Dear Colonel Turner:

The Environmental Improvement Division (EID) has completed a review of the Part B Hazardous Waste Permit Application submitted by Cannon Air Force Base (CAFB). This letter is EID's notice that, based on this review, the Part B as submitted is incomplete and/or deficient in many areas. The purpose of this letter is to delineate in writing those areas identified during this review, and require CAFB to comply with the New Mexico Hazardous Waste Act and the New Mexico Hazardous Waste Management Regulations (HWMR-2).

This review indicated that the Part B is incomplete and/or deficient as follows:

Section A: Part A Application: (Section 302.A.4.a.)

1. Form 1, Part IV. CAFB needs to provide the name and telephone number for the facility contact.
2. Form 1, Part VIII. CAFB needs to provide the name, address, and telephone number for the facility operator.
3. Form 1, Part IX. CAFB needs to complete this part of the application.
4. Form 1, Part XI. CAFB needs to provide a topographic map that extends at least one mile beyond the boundary of CAFB.

5. Form 3, Part I. CAFB needs to enter their EPA I.D. number at the top of the page.
6. Form 3, Part II-A. CAFB needs to complete this part of the application.
7. Form 3, Part V. CAFB needs to identify the location of all past and present hazardous waste treatment, storage and disposal areas. *2nd ab/c*
8. Form 3, Part VI. CAFB needs to provide a photograph that clearly identifies all existing structures, and all existing hazardous waste treatment, storage and disposal areas. *2nd ab/c*
9. Form 3, Part IX. CAFB needs to obtain the signature of a Defense Depot representative as the legal owner pursuant to the information provided in Part VIII, Form 3.

Section B: Facility Description: [Section 302.A.4.b.(1)]

Topographic Map: [Section 302.A.4.b.(1)(r)]

10. Page B-7. CAFB needs to provide a topographic map which shows the entire CAFB facility including 1,000 feet beyond the property boundary. This map does not need a scale of 1 inch \leq 200 feet since Appendix B-2 and B-3 provide sufficient contour intervals for a topographic profile. CAFB must also outline on Appendix B-2 and B-3 the location of the hazardous waste storage building.
11. Page B-8. CAFB needs to identify the legal boundaries of the hazardous waste management facility site. *(3-2-85)*
12. Page B-8. CAFB needs to identify the land use within 1,000 ft. of the base property boundary.
13. Page B-10. CAFB needs to provide the location of all access points onto CAFB and the hazardous waste management site.

Traffic Information: [Section 302. A.4.b.(1)(j)]

14. Page B-14. CAFB needs to discuss the movement of hazardous waste generated on-site to include: routes of transport; volume; number of shipments; the mode of transportation; and identify all traffic control signals enroute. *on sample site*
15. Page B-14. CAFB needs to discuss the movement of hazardous waste from off-site sources from the time the shipment leaves the nearest major highway. *still need*
16. Page B-15. CAFB needs to discuss the road surfacing and load bearing capacity for all roads used to transport hazardous waste to and from the hazardous waste management facility.

Section C: Waste Characteristics: [Section 302.A.4.b.(1)(b) and (c)]

Chemical and Physical Analyses: [Section 302.A.4.b.(1)(b)]

17. Page C-1. CAFB needs to amend the Part A as submitted to include all hazardous wastes identified in Appendix C-1 and C-2. *- Need to*

18. Page C-1. ~~CAFB needs to discuss the rationale for Group I and Group II wastes, and identify which Group II wastes can be stored as Group I wastes.~~
19. Page C-2. ~~CAFB needs to identify the process generating the hazardous waste identified in Appendix C-3; the rationale for the analyses performed; the test methods used to perform the analyses; and demonstrate that the samples analyzed were representative samples.~~ *Need*
20. Page C-3. ~~CAFB needs to identify each process generating hazardous waste both on-site and off-site and provide a detailed chemical and physical analysis from each waste stream. This must include a discussion on the rationale for the analyses performed; the test methods used to perform the analyses; and the sampling methods used to obtain a representative sample for analysis. CAFB must also discuss what QA/QC procedures will be followed if they differ from those described within SW-846.~~ *Need*
21. Page C-4. CAFB needs to discuss how the DOD issued regulations satisfies the waste analysis requirements, test method requirements, sampling requirements, and the requirements for inspecting and analyzing hazardous waste received from off-site. *Need*
22. Page C-7. CAFB makes reference to figure C-2 as a data output for a Group I waste listed in Appendix C-1. The data output is for acetone, which is listed in Appendix C-2 as a Group II waste.
23. Page C-10, ~~C-5~~. CAFB indicates that if the identity of a material is unknown, the material will be analyzed for the parameters identified in Table C-1. CAFB must provide the rationale for these parameters, the test methods that will be used to analyze the samples, and the sampling methods that will be used to collect a representative sample. *Need*
24. Page C-10. CAFB must demonstrate that the sampling methods, methods of analysis, and methods for packaging of samples according to the "USAF OEHL Recommended Sampling Procedures Manual" are approved procedures (e.g. SW-846). CAFB must also discuss what QA/QC procedures will be followed if they differ from those described within SW-846. *Need*
25. Page C-13. CAFB must discuss in detail the rationale for accepting paint in open containers based solely on a visual observation.
26. Page C-15. CAFB needs to discuss in detail the acceptance of ~~Group 11~~ hazardous waste from off-site, and the waste analyses that off-site generators have agreed to supply. *Need*
27. Page C-15. ~~CAFB must provide a more specific rationale for analyses than based on "MSDS/HMTS" information. This information fails to address the analysis of unknown materials, or the possibility of known materials being contaminated.~~ *Need*
28. Page C-15. CAFB needs to identify which of the analytical results included in Appendix C-3 is for the hazardous waste stream generated at the Corrosion Control Shop.

29. Page C-15. CAFB needs to retype the word "Control."

30. Page C-15. CAFB is to provide a listing of all EPA test methods, or equivalent test methods, that will be used to perform hazardous waste analyses on each waste stream, and for analyses to be performed on unknown materials received for storage. *need*

31. Page C-15. CAFB is to identify the EPA approved sampling method from which the sampling procedures described were extracted. In addition, CAFB must discuss all sampling equipment that will be used, collection of representative samples, number of samples to be collected, and decontamination of sampling equipment. *need*

32. Page C-17. CAFB needs to discuss waste analyses procedures for each ignitable, reactive or incompatible hazardous waste in that they are not discussed within the waste analysis plan in Section C-2. *8020*

Section D: Process Information: [Section 302.A.4.b.(2)(a) and 206.D.4.a-g.]

33. Page D-14. CAFB needs to discuss, and provide information on, the sealant to be used for covering the concrete floors. This must include information on what the sealant is resistant to, compatible with, its' load-bearing capacity, and any available manufacturer performed laboratory tests.

34. Page D-14. CAFB, on page D-14, indicates that shelves will be provided in eleven storage bays and then on page D-19 states that each storage bay will be provided with shelving. CAFB needs to make the appropriate corrections.

35. Page D-16. CAFB needs to discuss the compatibility of the absorbent material to be used in case of a spill or leak with the hazardous wastes in storage. *say chemistry need*

36. Page D-16, D-18. CAFB needs to provide information on the amount of absorbent material in storage, the size of spill which can be handled with the absorbent, and the number and size of empty recovery drums which are kept at the facility. *need*

37. Page D-16. CAFB needs to provide information on the type of pump that may be used to remove spilled material, the pumping capacity, the type of tubing, and the compatibility of the tubing with the hazardous waste in storage. *handle need*

38. Page D-14, D-19. CAFB needs to provide information on the type of shelving that small containers will be stored on, the compatibility of the shelves with the chemicals, the procedures that will be used to off-load and move small containers, and the procedures that will be used for the stacking of small containers. *need*

39. Page D-19. CAFB needs to provide information on the type of forklift to be used, the procedures used to place containers within the storage area and a demonstration that the forklift is capable of movement within the storage bays. *Need*

Section F: Procedures to Prevent Hazards: [Sections 302.A.4.b.(1)(d),(e), (f),(h), and (i); 206.B.4; 206.B.5.; 206.B.7.; 206.D.5.d.; and 206.D.7.e.]

40. Page F-3. CAFB needs to discuss the means to control entry through the other gate that is mentioned.

Inspection Schedule: [Section 302.A.4.b.(1)(e)].

41. Appendix F-1. ~~Log Sheets: CAFB does not address the inspection of all items identified on Tables F-1a and F-1b, and there is no space for the entry of the inspection time or the nature of any corrective actions taken.~~ *see*

42. Page F-12. CAFB needs to include the "time of the inspection" within the discussion presented.

Preventive Procedures: [Section 302.A.4.b(1)(h)]

43. Page F-13. CAFB needs to describe the loading and unloading procedures for hazardous waste at the hazardous waste storage site, and discuss that during usage daily inspections will be performed and entered on the inspections log. *?*

44. Page F-15. CAFB indicates that the use of protective equipment is discussed in Section H; however, there was no discussion on the use of protective equipment located within Section H. CAFB must make the appropriate corrections. *indicate where protective equipment is*

Section G: Contingency Plan: [Section 302.A.4 b.(1)(g).]

45. Page G-2. CAFB makes reference to 205.B.10.I. for emergency coordinators. This reference cite does not exist within the HWMR-2. *OK*

46. Table G-1. Emergency coordinators: CAFB must provide the addresses and home phone numbers of all persons identified to act as the emergency coordinator. *PC*

47. Table G-3, Page G-14, and Page G-2. Emergency Contacts: CAFB needs to substitute the HED 24-Hour Emergency Reporting number (505-827-9329) and the Hazardous Waste Section number (505-984-0020 x 340) in place of the Clovis EID telephone number. The reference to Mr. Raymond Sisneros must also be deleted. *OK*

48. Page G-6. CAFB needs to discuss how the responsibilities of the spill response team compare to the duties of the on-scene coordinator. *not*

49. Page G-8, G-9. CAFB needs to identify the following documents; discuss how they relate to hazardous waste management; and why they will be activated in lieu of the Contingency Plan. OPLAN, OPLAN 355-1, and the SPR Plan. *Plan*

50. Page G-18. CAFB needs to provide specific details on how facility personnel will be notified in case of an emergency. This information is not provided in Section G-2. *OK*

51. Page G-18. CAFB is to discuss how the DPDO chief will be able to identify the chemical composition of a spill. *OK*

52. Page G-18. CAFB needs to identify what containers are going to be stored, and what four bays will be used for this storage? *OK*

53. Page G-19. CAFB needs to discuss what procedures will be followed to assess the potential hazards to human health and environment. *new*

54. Page G-26. CAFB needs to discuss in detail the "spill containment procedures."

55. Page G-29. CAFB needs to initiate notification to the Environmental Improvement Division within 24-hours of any hazardous substance spill regardless of quantity.

56. Page G-30, G-31. CAFB needs to discuss how they will determine when clean-up is complete, ~~the number of 55-gallon drums available, the type of 55-gallon drums available,~~ decontamination of equipment, ~~number of samples that will be collected,~~ and the types of analysis that will be performed.

57. Page G-30. CAFB needs to be more specific within Section G-4 on the procedure to be followed to prevent the spread of fires, explosion, or releases involving hazardous wastes.

58. Page G-31. CAFB needs to discuss how the on-scene coordinator will ensure that incompatible wastes are not stored at the spill location.

59. Page G-31. CAFB needs to clarify rather they are going to clean all emergency response equipment or only the emergency response equipment used during an incident?

60. Page G-33. CAFB needs to discuss how emergency response equipment will be cleaned, and how they will determine that the equipment has been adequately decontaminated. *Partial*

61. Page G-33. CAFB needs to discuss the types of portable fire extinguishers to be used within the hazardous waste storage facility.

62. Page G-33. CAFB is to identify the location of all emergency response equipment and the capabilities of all emergency response equipment.

63. Page G-33. CAFB is to provide the location and amount of all absorbent material ~~on hand~~ and discuss its compatibility with the hazardous wastes in storage.

64. Page G-38. ~~CAFB needs to provide a copy of the arrangements made with the Portales Fire Department,~~ and any arrangements made with the local police department. *OK*

65. Page G-38. CAFB needs to discuss how the arrangements made with local authorities address the properties of hazardous waste handled, the access and evacuation routes, and the types of injuries that could result from an emergency situation.

66. Page G-38. CAFB needs to document that a copy of the Contingency Plan has been provided to all local authorities and emergency response teams.

67. Page G-39. CAFB needs to identify what signal will be used for evacuation.

Section H: Personal Training: [Section 302.A.4.6.(1)(I)]

68. Page H-2, H-22, H-27. CAFB needs to discuss how they will determine if an employee has read and understands the DPDS publication.
69. Page H-2, H-24. CAFB must demonstrate that all individuals providing on-the-job training are trained in hazardous waste management procedures.
70. Page H-22. CAFB needs to discuss the type of introductory and continuing training that will be required for each job description.
71. Page H-24. CAFB needs to demonstrate that the training provided is relevant to the job description.
72. Page H-24. CAFB needs to demonstrate that training is provided on the implementation of the contingency plan pursuant to emergency response; the use of emergency response equipment; the use of communications and/or alarm equipment; and procedures for responding to fires and/or explosions.

Section I: Closure Plans: [Section 302.A.4.b.(1)(7)]

73. Page I-2. CAFB needs to discuss what type of analyses will be performed, the number of samples that will be collected, and the sampling methods that will be used for sample collection.

This review did not address any portion of the Part B concerning thermal treatment of hazardous waste at CAFB. At such time as permit standards are established, these portions will be reviewed for completeness and adequacy.

In accordance with HWMR-2 and Section 74-4-10 NMSA, CAFB has 30 days from receipt of this notice to correct the deficiencies and/or provide the information requested herein to the satisfaction of the EID. Within this 30 day period, CAFB may request a hearing to negotiate a legally binding compliance schedule. The request on the part of CAFB will not effect the 30 day response period.

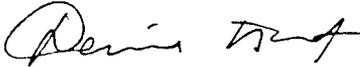
If you fail to submit the documentation requested herein, you shall be subject to one or more of the following:

- (1) an order requiring compliance within a specified period, pursuant to 74-4-10 NMSA 1978;
- (2) a civil action in district court for appropriate relief, including a temporary or permanent injunction, pursuant to 74-4-10 NMSA 1978;
- (3) the assessment of civil penalties up to \$10,000 per violation for each day of continued non-compliance, pursuant to 74-4-12 NMSA 1978.

Compliance with the requirements of this notice does not relieve CAFB of its obligation to comply with the HWMR-2 in other activities which it carries on nor does it relieve CAFB of its obligation to comply with any other applicable laws and regulations.

If you have any questions regarding this notice, please contact Mr. Boyd Hamilton, Environmental Scientist, New Mexico Environmental Improvement Division, P.O. Box 968, Crown Building, Santa Fe, New Mexico 87504 or call (505) 984-0020, ext. 340. Please also address to Mr. Hamilton's attention the information you provide in response to this letter.

Sincerely



Denise Fort
Director
Environmental Improvement Division

cc: John Guinn, EID, District IV
EID Legal
Guanita Reiter, EPA, Dallas
Jamie Wright, EPA, Dallas