

RED CAFB 2000



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GOVERNOR

State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
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PETER MAGGIORE  
SECRETARY  
PAUL R. RITZMA  
DEPUTY SECRETARY

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

June 8, 2000

Colonel Loyd S. Utterback  
Commander  
100 S. DL Ingram Blvd Suite 108  
Cannon AFB NM 88103-5214

**RE: NOTICE OF ADMINISTRATIVE COMPLETENESS  
RCRA PERMIT APPLICATION - PART A & PART B  
CANNON AIR FORCE BASE  
EPA ID NO. NM7572124454**

Dear Colonel Utterback:

The Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department has reviewed the July 13, 1999 Cannon Air Force Base RCRA Permit Application - Part A & Part B. HRMB has made a determination that the document is administratively complete.

The New Mexico Hazardous Waste Management Fee Regulations 20 NMAC 4.2 require assessment of fees when administrative review of a document is complete. HRMB will issue an invoice to you under a separate letter. Payment is due within sixty (60) calendar days from the date that you receive the invoice.

Should you need to request an extension of the sixty-day period, the request must be received by the New Mexico Environment Department a minimum of fourteen (14) calendar days prior to the end of the sixty-day period. Should you disagree with the fee assessed, you may file an Administrative Appeal under the provisions of 20 NMAC 4.2.302.1.

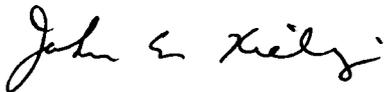
Upon receipt of the fees, NMED will begin review of the document for technical adequacy and completeness.

Although HRMB cannot offer a complete technical review of Cannon's application at this time, we are able to offer some preliminary technical comments for Cannon's consideration in Attachment 1. The Department will provide Cannon with a full technical review as soon as we have received the appropriate fees.

Colonel Utterback  
Notice of Administrative Completeness  
June 8, 2000  
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If you have any questions concerning the permit renewal process, please call Mr. Glenn von Gonten or my staff at 505-827-1558 (extension 1024).

Sincerely,



John E. Kieling,  
Acting Manager,  
RCRA Permits Management Program

[CAFB-99-005]

cc: Daniel A. Barnett, Cannon Air Force Base  
John S. Pike, Cannon Air Force Base  
David Neleigh, EPA Region 6  
James P. Bearzi, NMED-HRMB  
Robert S. Dinwiddie, NMED-HRMB  
Pam Allen, NMED-HRMB  
Carl Will, NMED-HRMB  
Steve Pullen, NMED-HRMB  
Glenn von Gonten, NMED-HRMB  
Reading File and Red CAFB File

**ATTACHMENT 1**

## ATTACHMENT 1

The following preliminary comments address technical issues that HRMB noted during our administrative completeness review. HRMB is providing these preliminary comments for Cannon's consideration. However, please do not submit a formal written response at this time. HRMB will provide Cannon with technical review comments soon after we are in receipt of the assessed permit application fees.

### PERMIT APPLICATION - PART A

#### ITEM III.C - GEOGRAPHIC LOCATION

Comment 1. Please enter the latitude and longitude for Cannon AFB in degrees, minutes, and seconds.

#### ITEM XIV - DESCRIPTION OF HAZARDOUS WASTES

Comment 2. Cannon's container storage unit is not a "containment building" as specified in 40 CFR 264.1100. Please revise Section XIV to refer to "Containers" (Process Code SO2) rather than a "Containment Building" (Process Code SO6).

#### ITEM XV - MAP

Comment 3. Please include a map that depicts all springs and surface water bodies, plus all drinking water wells.

#### ITEM XVIII - CERTIFICATIONS

Comment 4. Cannon's Part A signature page and discussion throughout the Part B indicate that the Defense Reutilization and Marketing Service (DRMS) will be the "operator" of Cannon's hazardous waste container storage area (hazardous waste storage facility - HWSF) and that Cannon AFB is the owner of the facility. If this is correct, then the Department will issue this permit jointly to both Cannon Air Force Base and the Defense Reutilization and Marketing Service. However, ITEM VII (Operator Information) lists Cannon AFB rather than DRMS as operator. Please resolve this issue and revise Cannon's permit application appropriately.

Please provide additional explanation/discussion in Section 1 of the Part B on the relationship between DRMS and Cannon AFB to address the requirements of 40 CFR 270.14(b)(1) [*A general description of the facility*].

### PERMIT APPLICATION - PART B

#### 40 CFR 270.14(b)(2) [*Chemical and Physical Analyses*]

Comment 5. Cannon indicates in § 2.3 (page 8) that they cannot submit copies of each Hazardous Waste Profile Sheet (HWPS) and laboratory results for each hazardous waste stream generated because the complete set of these documents is too extensive to include in the permit application; rather, Cannon provided examples of these documents in Appendix D. However, the Department must require Cannon to submit copies of the most recent Hazardous Waste

Profile Sheet and the lab results for each waste stream generated, at least the past three years. Examples of these documents are not adequate for the Department to determine whether "At a minimum, these analyses shall contain all the information which must be known to treat, store, or dispose of the wastes properly. . . .", in accordance with §§ 264.13 and 270.14(b)(2).

**40 CFR 270.14(b)(3) [Waste Analysis Plan]**

Comment 6. Please attach a copy of Cannon's Hazardous Waste Analysis Management Action Plan (HWAMAP) referred to in Section 3 (page 9) and throughout Cannon's Part B. Based on the discussion in the Part B, it appears that the HWAMAP contains detailed information concerning Cannon's waste analysis plan that must be reviewed by the Department to determine whether it meets the requirements specified in §§ 270.14(b)(3) and 264.13(b).

Comment 7. Section 3.2.4 (Page 21) specifies the procedures that Cannon will follow in order to characterize off-site waste. This section appears to contradict § 1.2, which states that "The HWSF currently stores only those hazardous wastes generated within the base boundaries, and disposes of its wastes off-site through licensed treatment, storage or disposal contractors." It is the Department's understanding that Cannon will not accept any off-site waste. Please specify whether Cannon will accept off-site waste and make all appropriate revisions to Cannon's Part B.

**40 CFR 270.14(b)(7) [Contingency Plan]**

Comment 8. Appendix H (Pollution Incident Report form) must be revised to include all the information specified in § 262.34(d)(5)(iv). The revised form should include the phone number for NMED-HRMB and should specify that Cannon will report all incidents verbally within 24 hours and in writing within 5 days. The Department suggests that the revised form specifically reference § 262.34(d)(5)(iv).

**40 CFR 270.14(b)(12) [Training Plan]**

Comment 9. Please explain or justify why are DRMS-LH employees are excepted in Appendix I (§ I.A.1). Please provide a copy of the referenced DRMS Corporation Training Plan and "Enclosure 1" (n.b. 1, 2, 3, 4 are missing) for the Department's review.

**40 CFR 270.15 [Specific Part B Information Requirements for Containers]**

Comment 10. Cannon's citation of "40 CFR 268.7(a)(1)(vi)" in §§ 15 and 15.1.1 appears to be incorrect. I believe the correct citation should be 40 CFR 268.7(a)(4).

Comment 11. Please explain what is meant by ". . . will be provided to the contractor. . . ." in § 15.1.1 (Page 73).

**40 CFR 270.15(c) [Compliance with § 264.176]**

Comment 12. Section 15.4.2 states that incompatible wastes and/or materials will not be mixed or stored together but does not detail what procedures Cannon has in place to ensure that this does not happen. Please revise § 15.4.2 (Page 77 - Incompatible Waste) to specify how

Cannon will determine which wastes are incompatible and document how the wastes will be separated. Please review §§ 270.15(c); 264.177(c); 264.177(a), (b); and 264.17(b), (c) for the appropriate regulatory citations.

The revised section must discuss how the layout of the container storage area and Cannon's hazardous waste handling procedures prevent incompatible wastes from being placed in the same containers and how potentially incompatible waste is appropriately segregated into separate bays of the container storage area. Please refer to Appendix V to § 264 for "Examples of Potentially Incompatible Waste" that Cannon must consider.

**40 CFR 270.15(e)**            ***[Information on Air Emission Control Equipment as Required in § 270.27]***

Comment 13.            Please revise § 16.2 (Page 79) to include the information required pursuant to §§ 270.15(e) and 270.27 (air emissions). Also, please review §§ 264.1086, 264.1088, 270.15(e), and 270.27 for additional requirements that may apply to Cannon.

**40 CFR 270.14(b)(2)**        ***[Chemical and Physical Analyses]***

Comment 14.            Please explain the basis for the "maximum amount" specified Appendix A (Page A-2).

Comment 15.            Please specify which generator locations are referred to by "MSS" & "SVS" in Appendix B (Page B-3).

**40 CFR 270.14(b)(3)**        ***[Waste Analysis Plan]***

Comment 16.            Cannon has provided much useful information in § 3.2 and specifically Table 3-2; however, not all the required information related to the selection of waste parameters has been presented. As noted above, the Department must review Cannon's HWAMAP in order to determine whether it satisfies the minimum requirements for a Waste Analysis Plan, as specified in §§ 270.14(b)(3) and 264.13(b).

The Department suggests that Cannon review EPA's guidance (WAP Guidance Manual) on Waste Analysis Plans (USEPA, OSWER 9938.4-03, April 1994; *Waste Analysis At Facilities That Generate, Treat, Store, And Dispose Of Hazardous Wastes - A Guidance Manual*). Although the regulations do not specify that facilities must follow any particular format, the Department will require that all the information discussed in EPA's WAP Guidance Manual be submitted in Cannon's Part B. The Department recommends that Cannon particularly review *Part Two: Documenting and Conducting Waste Analysis* of EPA's WAP Guidance Manual

Cannon should revise Table 3-2 to include certain information that was omitted, such as whether the waste streams are subject to the Land Disposal Restrictions (LDR) and the EPA Hazardous Waste Codes. The Department recommends that Cannon refer to Table 2-3 of EPA's WAP Guidance Manual when revising Table 3-2 of their Part B.

**40 CFR 270.14(b)(7)      *[Contingency Plan]***

Comment 17.            The Department suggests that Cannon resubmit the HWPS in Appendix D using DRMS Form 1930 (dated August 1997) or more recent forms. Cannon should also address any discrepancies between the DRMS forms and Table 2-11 of EPA's WAP Guidance Manual.

**40 CFR 270.14(d)            *[Information Requirements for Solid Waste Management Units]***

Comment 18.            The Department suggests that Cannon revise § 16.2 (Page 79) to include a reference list for each finalized RFI report (excluding workplans) that specifies which SWMUs were investigated and the results of that investigation (i.e. RFI Report) to meet the requirements of § 270.14(d)(2) & (3).

**40 CFR 270.14(d)            *[Information Requirements for Solid Waste Management Units]***

Comment 19.            CAFB should add a new section to Section 16 that specifically notes that CAFB has been involved with an RFI since the issuance by EPA of their HSWA Modules in 1989. This new section should note that the required data was submitted in the above noted RFI reports (see Comment 18).

**40 CFR 270.15                *[Specific Part B Information Requirements for Containers]***

Comment 20.            Cannon uses the phrase ". . . responsibility of the generator. . ." in § 15.1 (Page 73). Please note that this permit will be issued jointly to CAFB and DRMS, as noted above, and will refer throughout to "The Permittees." Please note that it will be the "Permittees" responsibility to label all containers, etc., rather than the "generators" responsibility.

**40 CFR 270.15(a)(5)        *[Compliance with § 264.175]***

Comment 21.            Please revise § 15.2.5 (Page 77) to specify how spills will be analyzed to determine the correct hazardous waste designation, in accordance with §§ 270.15(a)(5) and 264.175(b)(5).