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CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

October 31, 2000

Colonel Jeffrey A. Remington  
Commander  
100 S. DL Ingram Blvd Suite 108  
Cannon AFB, New Mexico 88103-5214

**RE: REQUEST FOR SUPPLEMENTAL INFORMATION  
RCRA PERMIT APPLICATION - PART A & PART B  
CANNON AIR FORCE BASE  
EPA ID NO.: NM7572124454**

Dear Colonel Remington:

On June 8, 2000 the Hazardous Waste Bureau (HWB) of the New Mexico Environment Department (NMED) determined that the Cannon Air Force Base (Cannon) RCRA Permit Renewal Application (Parts A and B) submitted on July 13, 1999 was administratively complete. On June 16, 2000 HWB submitted an invoice for fees which Cannon paid on September 12, 2000.

In accordance with 20.4.2.201.3 and 20.1.4 NMAC, HWB has completed its first technical review of Cannon's Permit Renewal Application and has determined that it is not technically adequate and that changes are necessary before it can be approved. Therefore, HWB is issuing Cannon with this *Request for Supplemental Information* (RSI).

HWB's numbered comments are included as Attachment 1 and constitute our first technical review of Cannon's permit renewal application. Please submit a revised Permit Application or replacement pages within sixty (60) days of your receipt of this RSI. In addition, please include a response letter that indicates exactly where revisions have been made, cross-referencing HWB's numbered comments.

Following Cannon's submission of a revised Permit Renewal Application, HWB will again review the application for technical merit. If found to be technically adequate, HWB will then begin drafting Cannon's RCRA Permit. In accordance with 20.4.2.201.3.3 NMAC, HWB shall review the application and issue a Draft Permit or a Notice of Intent to Deny the Permit within one year after the application is deemed administratively complete, excluding time tolled during

Colonel Remington  
Request for Supplemental Information  
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all periods in which HWB is awaiting a response from the applicant to a Request for Supplemental Information or a Notice of Deficiency. If you have any questions concerning this RSI, please call me at 505-827-1558 (extension 1024).

Sincerely,

A handwritten signature in black ink that reads "Glenn von Gonten". The signature is written in a cursive style with a large, prominent 'G' at the beginning and a long, sweeping underline.

Glenn von Gonten  
CAFB Project Leader  
RCRA Permits Management Program

GVG  
[CAFB-99-005]

cc: James P. Bearzi, NMED-HWB  
Robert S. Dinwiddie, NMED-HWB  
Pam Allen, NMED-HWB  
John Kieling, NMED-HWB  
Daniel A. Barnett, 27 CE/CEV  
John Pike, CAFB 27 CE/CEVP  
Sanford Hutsell, CAFB 27 CE/CEVP  
David Neleigh, EPA Region 6  
Reading File and Cannon Air Force Base Red File

# ATTACHMENT 1

## ATTACHMENT 1

The following comments comprise HWB's first technical review of Cannon's Permit Renewal Application. To ensure compliance with the regulations, HWB's comments below follow the order that the contents of a permit application are specified in the New Mexico Hazardous Waste Regulations (20.4.1.900 NMAC, incorporating Subpart B [Permit Application] to 40 CFR 270). As noted above, please provide a written response to each numbered comment as well as revisions to the application.

### 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 topographic map that depicts all springs and surface water bodies, plus all drinking water wells within ¼ mile of Cannon AFB.

#### 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 HWB 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, HWB 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 HWB 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 40 CFR 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 the 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 HWB 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 HWB'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 Permit Application - 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-HWB and should specify that Cannon will report all incidents verbally within 24 hours and in writing within 5 calendar days. HWB 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 DRMS-LH employees are exempted in Appendix I (§ I.A.1). Please provide a copy of the referenced DRMS Corporation Training Plan and "Enclosure 1" (e.g. 1, 2, 3, 4 are missing) for HWB'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 in Table 3-2; however, not all the required information related to the selection of waste parameters has been presented. As noted above, HWB 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).

HWB 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, HWB will require that all the information discussed in EPA's WAP Guidance Manual be submitted in Cannon's Part B. HWB recommends that Cannon particularly review Part Two of EPA's WAP Guidance Manual: *Documenting and Conducting Waste Analysis*.

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. HWB 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.** HWB 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.** HWB 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 a RCRA Facility Investigation (RFI) since the issuance of their HSWA Module by EPA in 1989. This new section should note that the required data was submitted in one of 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).