



BRUCE KING
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

ENTERED

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

April 2, 1993

Fazlur Rab, Chief
Environmental Management Office
USAADACENFB
Attn: ATZC-DEH-E
Fort Bliss, TX 79916

RE: Administrative Review: Notice of Deficiency of Part B Permit
Application
NM4213720101

Dear Mr. Rab:

The New Mexico Environment Department has completed its administrative review of the Fort Bliss Open Detonation Treatment Facility located on the McGregor Range in Otero County, New Mexico. The permit application is being reviewed under the New Mexico Hazardous Waste Management Regulations and has been found to be incomplete. The deficiencies to be addressed are described in the enclosed seven page attachment. The regulations cited in the attachment are the New Mexico Hazardous Waste Management Regulations (HWMR-7), Part V which adopts and incorporates 40 CFR Section 264 and Part IX which adopts and incorporates 40 CFR Section 270.

Submit all information within forty five (45) days of receipt of this notice of deficiency. If you fail to provide the information within the forty five (45) days, you may receive a Notice of Violation and the facility may be subject to permit denial pursuant to HWMR-7 Part IX, 40 CFR Section 270.10(c). In cases where specific information cannot be provided within the forty five (45) day period, an extension to submit such information may be requested.

It is recommend that you contact Tom Tatkin or Carl Stubbs at (505) 827-4308 to discuss any questions you may have on the scope of the work required.

Sincerely,


Barbara Hoditschek
Program Manager
RCRA Permit Section

Fazlur Rab, Chief
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Enclosure.

xc: Benito Garcia, NMED, HRMB
David Neleigh, US EPA Region VI
File Red

**ADMINISTRATIVE COMPLETENESS REVIEW
OF PART B APPLICATION**

FORT BLISS MCGREGOR RANGE OPEN DETONATION TREATMENT FACILITY

I. Facility Description

A. General Description of the Facility as required in Part IX, 40 CFR 270.14(b)(1).

The permit application must:

1. provide general dimensions and a structural description of the unit (This may include an active trench with adjacent buried trenches, a single active trench that is groomed and reused, burn areas, and containment or other design configurations.);
2. engineering drawings that approximate the unit's dimensions horizontally and vertically, shows ramps, berms, fencing and any other man-made features used in association with the unit;
3. provide the best available description of all wastes that have ever been managed at the open detonation unit (summarize historical information on the volume and composition of these wastes.); and
4. provide a statement of whether you intend to operate an open burn/open detonation facility or an open detonation only facility.

B. Topographic Map as required in Part IX, 40 CFR 270.14(b)(19). The permit must include a map or maps that:

1. show the terrain for a distance of 1,000 feet outside the unit at a map scale of 1 inch equal to not more than 200 feet with appropriate contour lines;
2. a wind rose diagram showing prevailing wind directions and velocities;
3. the legal boundaries of the facility;
4. access control to the unit;
5. any on-site or off-site wells, buildings, and drainage and flood control barriers; and
6. locate the treatment facility, unit boundaries, buildings

on- and off-site, public roadways, and passenger railways.

C. Description of Treatment Unit as required in Part IX, 40 CFR 270.23.

The permit application must:

1. provide greater detail in plans and engineering reports than was provided in the Part B Permit Application;
2. describe how the unit will be located, designed, constructed, operated, and maintained;
3. provide detailed hydrologic, geologic, and meteorologic assessments for the region in which the site is located. (This information may be available in existing studies and reports, but must be incorporated into the permit application specific to the unit. You are also required to implement a soil sampling and analysis plan as required in 40 CFR 264.601.); and
4. describe how "kick-out" residues will be treated (Some types of reactive waste will not detonate but rather deflagrate. Results of detonation of these types of wastes can cause dispersions of untreated explosives into the environment. Explain how this has been considered in management of the reactive wastes. [e.g. Some dry rocket propellant maybe more thoroughly treated by burning.]).

D. Floodplain as required in Part V, 40 CFR 264.18(b) and Part IX, 40 CFR 270.14(b)(11)(iii). The permit application must provide a copy of a Federal Insurance Administration (FIA) flood map to determine whether the facility is located in a 100 year floodplain. If an FIA flood map does not exist, other methods or information must be submitted that will be equivalent, including, but not limited to landsurveying, hydrologic and hydraulic calculations. If the facility is in a 100 year floodplain, refer to the additional requirements found in Part IX, 40 CFR 270.14(b)(11)(iv)(A).

E. Traffic Patterns as required in Part IX, 40 CFR 270.14(b)(10). The permit application must:

1. estimate the number and type of vehicles in and around the facility;
2. provide information about hazardous waste transfer or pick-up stations;
3. describe the quantity of waste moved per movement per vehicle; and

4. describe route surface composition and load bearing capacity.

II. Waste Characteristics

A. Characterize the Waste as required in Part IX, 40 CFR 270.14, 270.15, and 270.18.

The permit application must:

1. provide physical and chemical characteristics of wastes and residues (Provide clear and/or enlarged copies of the POLU10 Model submitted in the Part B Permit Application, manufacturer's specifications, or equivalent information for all hazardous wastes treated at the open detonation facility.);
2. provide information on how containers of waste and waste stored in piles are managed. (Containers were mentioned in Appendix C, Safety SOP. Waste stored in piles was mentioned in Appendix B, Installation Hazardous Waste Management Plan.).

B. A Waste Analysis Plan as required in Part V, 40 CFR 264.13(b) and Part IX, 40 CFR 270.14(b)(3).

The permit application must:

1. describe a plan to provide detailed chemical and physical analysis of a representative sample of the waste to be treated. (If the waste to be open detonated is substantially the same as the waste when it was manufactured, the manufacturer specifications or process knowledge may be substituted for the required analysis plan. Any claim to equivalency must be documented.);
2. describe a plan to monitor non-reactive hazardous waste treated simultaneously with reactive waste at the unit (such as lead projectiles of small arms munitions and hazardous constituents of containers, housings, casings, etc.);
3. describe a plan for sampling and analysis, or process knowledge of hazardous waste that is generated off-site and destined for open detonation at this facility;
4. specify the locations of the Waste Analysis Plan kept at the facility;
5. identify the designated personnel position(s) and organization responsible for updating the plan; and
6. if monitoring is chosen as the method of compliance with the Waste Analysis Plan, describe the parameters that

will be analyzed in each reactive and non-reactive hazardous waste, the rationale for the selection of these parameters, the test methods which will be used for these parameters, and information on sampling methods used to obtain representative samples of the waste being analyzed.

III. Procedures to Prevent Hazards

A. Inspection Schedule as required in Part V, 40 CFR 264.15 and Part IX, 40 CFR 270.14.

The permit application must:

1. provide a copy of the inspection schedule for the facility;
2. list the items to be checked;
3. provide a checklist of inspection monitoring equipment, safety and emergency equipment; and
4. provide detailed information on inspection record keeping.

B. Preparedness and Prevention as required in Part V, 40 CFR 264 and Part IX, 40 CFR 270.14.

The permit application must:

1. provide greater detail in the description and location of internal communications to instruct facility personnel than was submitted in the Part B Permit Application;
2. describe access to communication equipment;
3. describe fire control equipment and the location where it is maintained;
4. document testing and maintenance schedules and procedures for the communication and emergency equipments; and
5. document arrangements with police, fire departments, emergency response teams, and local hospitals.

IV. Contingency Plan as required in Part V, 40 CFR 264.52, 264.53, and 264.56, and Part IX, 40 CFR 270.14(b)(7).

The permit application must:

- A. identify where the contingency plan copies are located,
- B. list the location and description of emergency equipment that would be used at the open detonation unit;

- C. document plans for the emergency coordinator to identify character, source, amount and extent of any unplanned explosion, fire or release,
 - D. document the means for assessment of possible hazards to human health or the environment that may result from an unplanned explosion, fire, or release. (This may be found in existing documents, but must be specifically included in the permit application.);
 - E. provide more detailed information on emergency procedures including notification procedure, identification of hazardous materials, and assessment criteria than was provided in the Part B Permit Application; and
 - F. describe a schedule of remedial action.
- V. **Personnel Training** as required in Part V, 40 CFR 264.16 and Part IX, 40 CFR 270.14(b)(12).
The permit application must:
- A. provide an outline of both the introductory and continuing training program;
 - B. provide records of training in emergency response; and
 - C. describe how training will be designed to meet actual job tasks.
- VI. **Closure Plan** as required in Part V, 40 CFR 264.112 through 264.114 and Part IX, 40 CFR 270.14(b).
The permit application must:
- A. contain a copy of the closure plan describing partial and final closure procedures;
 - B. describe the maximum extent of the unclosed portion of the unit during the life of the facility;
 - C. describe the procedures for removal of hazardous waste, residues, and contaminated soils including the location of disposed soils when removed;
 - D. define methods for sampling and testing surrounding soils and criteria for determining decontamination levels;
 - E. estimate the year of closure;
 - F. describe the closure schedule including total time to close and trackable intervening closure activities;
 - G. contain the location and number of copies of the plan; and

- H. identify the personnel position(s) and organization responsible for storage and updating the facility copy of the plan.

VII. Protection of Ground Water

A. Hydrology as required in Part IX, 40 CFR 270.23(b). The permit must describe the hydrology below the open detonation unit. (This may be available through published or private reports. Provide copies of the reference used.).

B. Soil Monitoring as required in Part V, 40 CFR 264.601(A)(2) and Part IX, 40 CFR 270.23(b).

The permit application must:

1. contain the proposed soil monitoring program, including sample collection, sample preservation and shipment, sampling and analysis procedures, and chain of custody control;
2. indicate the parameters selected and the analytical method for each parameter;
3. describe background values for each proposed monitoring parameter or constituent; and
4. describe the proposed sampling, analysis and statistical comparison procedures.

VIII. Specific Requirements for Open Detonation on the Ground Surface

A. Air Quality Assessments as required in Part V, 40 CFR 264.601(c)(1) and Part IX, 40 CFR 270.23(b).

The permit application must:

1. describe the potential for the emission and dispersal of gases, aerosols and particulate;
2. describe the effectiveness and reliability of any systems and structures used to reduce or prevent emissions of hazardous constituents to the air;
3. provide policy or statements indicating operational conditions of the facility (such as not exposing ash residues to the open air when wind speed is greater than 15 mph); and
4. describe the existing air quality, other sources of contamination and the potential impacts to human health.

B. Potential Pathways of Exposure and Potential Exposure Magnitude as required in Part IX, 40 CFR 270.23(c). The permit application must describe the potential for the public to be exposed to hazardous wastes, including, but not limited to:

1. information on how long waste will remain in the unit before it is detonated
2. the length of time after operation of the unit before re-entry of personnel to the detonation site is allowed, and
3. management of residues.