

August 10, 1990

Ms. Gretchen Van Doran PRI/Primate Research Institute P.O. Box 1027 Holloman Air Force Base, NM USA 88330-1027 LIP DE ST SELES

GARREY CARRUTHERS
Governor

DENNIS BOYD Secretary

MICHAEL J. BURKHART Deputy Secretary

RICHARD MITZELFELT



Dear Ms. Van Doran:

This letter is in response to your request for concurrence from our agency on the handling of NMSU Primate Research Institute's liquid waste. As we discussed in our phone conversation, the Environmental Improvement Division's (EID) Surface Water Quality Bureau has had little involvement with the Holloman Air Force Base (HAFB) wastewater system. This bureau assists the U.S. Environmental Protection Agency (EPA) with the administration of the federal National Pollutant Elimination System (NPDES) permit program under the federal Clean Water Act. The State of New Mexico is not delegated primacy for this program.

NPDES permits are issued to facilities which discharge to "waters of the United States" as defined at 40 CFR 122.2. Currently, the EPA has not ruled that Holloman Lake, which receives the treated wastewater, is a "water of the U.S.". Therefore, no NPDES permit has been issued by the EPA. The state does not issue a similar permit, for protection of surface water.

However, it is my understanding the EID's Ground Water Bureau may have issued a ground water discharge plan (permit) to HAFB. As I suggested when we conversed on this, you should contact Mr. Ernest Rebuck, Program Manager, EID Ground water Section (827-2900) about the dicharge plan.

You may also wish to contact Mr. Boyd Hamilton, Program Manager of the EID Hazardous Waste Section for information at 827-2926.

If you have any questions please feel free to call me at (505) 827-2795.

Sincerely,

Glenn E. Saums
Program Manager
Surface Water Section

GES:lo

xc: Boyd Hamilton, Program Manager, Hazardous Waste Section Ernest Rebuck, Program Manager, EID Ground Water Section

# PRI/PRIMATE RESEARCH INSTITUTE

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Biomedical Research in Rodents, Domestic Animals & Primates:
Comparative Toxicology & Metabolism
Endocrine Toxicology
Reproductive Biology
Experimental Surgery
Comparative Pathology
Computer Data Management

June 25, 1990

New Mexico Health & Environment P.O. Box 968 - Runnels Bldg. Santa Fe. New Mexico 87504-0968

RE: Concurrence of Liquid & Solid Waste Handling Procedures

Attached (A) is a request from the White Sands Missle Range Master Planning Committee (WSMRMPC) for a concurrence from your agency in the handling of the Primate Research Institutue's liquid and solid waste.

As a tenant on Holloman Air Force Base we access the general waste disposal system currently in place on the base. As indicated by the attached (B & C), we have satisified the questions Holloman has raised regarding infectious materials handling and how PRI introduces disinfectant to its liquid and solid sewage.

The Primate Research Institute is petitioning the WSMRMPC for permission to begin construction on a new facility at the Holloman site (the land is owned by WSMR), and the committee has asked for this concurrence.

Your prompt response would be greatly appreciated as this will be one of our last requirements prior to passage in the Planning Committee.

Sincerely,

Mas Stresen-Reuter

Division Head, Operation Resources

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cc: Howard Higgins/Mariah, Inc.

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STEWS-EL-PM (210-20)

MEMORANDUM FOR COMMANDER, DEPARTMENT OF THE AIR FORCE, HEADQUARTERS 833D COMBAT SUPPORT GROUP (TAC), ATTN: MRS. MOYA HOLLOMAN AIR FORCE BASE, NM 88330-5000

SUBJECT: Holloman Primate Facility

- 1. The Environmental Office (EL-N), has reviewed the EA for the Holloman Primate Facility and has concluded that documentation is needed for the following:
- a. A determination that no threatened and endangered species were impacted by this action is reached in the EA, however, there is no record that the State and Federal agencies have concurred in this determination (Section 7, Consultation).
- b. Concurrence from the New Mexico Health and Environment Department concerning liquid and solid waste handling procedures.
  - c. Hazardous waste handling through NMSU. HWML-5
- 2. Until documentation to meet the above requirements is provided WSMR cannot concur with the EA and the MPBA cannot be approved, therefore, construction may not begin at the site.
- 3. Point of contact for this action is Mr. Bob Andreoli, Chief, EL-N, 678-2224.

FOR THE COMMANDER:

Director, Engineering, Housing and Logistics

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May 12, 1989

833rd Combat Support Group DEV

ATTN: Sharon Moore

Holloman AFB, NM 88330

Dear Ms. Moore:

This letter is a certification that all infectious waste generated as a result of non-clinical research at the Primate Research Institute is collected separately, sterilized (autoclave), and/or incinerated on site. Infectious sharps are collected in puncture-resistant, leak-proof containers, and also autoclaved and incinerated on site.

Sincerely,

Am Stresen-Reuter

Director of Operations Resources

Sten Renter.

Donna Eisenhauer

P. Ranquist **C**L.

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Comparative Toxicology & Metabolism
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17 June 1987

Mr. Howard E. Moffitt
Deputy Base Civil Engineer
Department of the Air Force
Headquarters 833d Combat Support Group (TAC)
Holloman Air Force Base, NM 88330-5000

## Dear Mr. Moffitt:

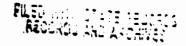
In regard to your letter dated 18 May 1987, Request for Information and Water System Modifications, our response corresponds to the paragraphs in which your questions were presented:

An online data search was made with the National Library of Medicine of more than 10,000 articles. We were unable to locate any published articles dealing with AIDS (HIV) and sewage. We are continuing this data search, as new material is published monthly and will advise you when we locate articles dealing with this question.

In view of your concern, the animal cage areas are washed down with chlorox which is a known disinfectant that kills viruses. We are investigating the installation of a pasteurization and or a sterilization system for the Quarantine Area. We will keep you informed of this progress.

- 2. (a) This item has been corrected.
  - (b) This item has not been completed. We are waiting on shipping information from the manufacturer.
  - (c) PRI Maintenance Supervisor is developing a maintenance schedule and will forward you a copy as soon as it is completed.

I would like to bring to your attention that the back flow preventors aggravate an already low water pressure situation causing a loss of about 5 psi. During high temperature days as we have experienced lately, the pressure has dropped significantly to about 20 psi. This is not adequate to hose down the animal cages.



management of asbestos wastes. An employee with this training shall be present at the facility at all times when asbestos wastes are being disposed.

#### 403. INFECTIOUS WASTE

- A. The generator of infectious waste shall certify that the waste has been rendered noninfectious by sterilization, incineration or another appropriate method prior to disposal. The certification shall be provided to the transporter and/or disposal facility and be kept as the facility operating record.
- 8. Compactors, grinders or similar devices shall not be used to reduce the volume of infectious waste before the waste has been rendered noninfectious.
- C. Waste consisting of human anatomical remains, including human fetal remains, shall not be disposed of at a landfill prior to incineration. These wastes may also be interred or disposed of by other means approved by the Director.
- D. Infectious waste, except for sharps, shall be contained in double disposable plastic bags which are impervious to moisture and have a strength sufficient to predude rupture during normal use. The bags shall be securely tied so as to prevent leakage or expulsion of solid or liquid wastes during storage, handling or transport.
- E. Sharps shall be contained for storage, transportation, treatment and disposal in leak-proof, rigid, puncture-resistant containers which are taped closed or tightly lidded to preclude loss of contents.
- F. All bags used for containment purposes shall be red or orange and clearly identified as specified in 29 CFR 1910.145 (f) (4). Rigid containers shall be labeled "biomedical waste", or otherwise conspicuously labled as holding infectious waste, or placed in disposable bags used for other infectious wastes.
- G. Infectious sharps shall not be subject to compaction.

#### 404. MUNICIPAL WASTE COMBUSTION ASH (MWC ASH)

#### A. Transportation of MWC ash;

- No transporter shall accept or transport MWC ash unless it has been treated or is securely
  covered to prevent release of fugitive dust;
- 2. Transporters shall cover vehicles to prevent fugitive dust loss during transport;
- Transporters shall line or seal vehicles in such a manner to prevent any leakage of liquids or fugitive dust during transport.

#### B. Disposal of MWC ash;

#### The operator shall:

- Prepare a separate trench to receive MWC ash. Trenches receiving MWC ash that have failed an appropriate leaching test under Section 305.8 for MWC ash shall have natural liners with a minimum thickness of 5 feet and a permeability not exceeding 1 x 10-7 cm. per second. Artificial liners providing equal or greater protection may be used,
- Provide a ground water monitoring system and a leachate collection system unless an adequate demonstration is made to the Director that such systems are not necessary.
- 3. Keep the ash wetted to prevent fugitive emissions prior to covering,

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Biomedical research in:
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Reproductive & Endocrine Toxicology
Primate Reproduction
Comparative Metabolism
Experimental Surgery
Computer Data Management

PRI Fax Number:

(505) 479-4103



# TELECOPIER TRANSMITTAL SHEET

DATE:	7.26.90
PLEASE DELIVER THE FOLLOWING PAGES TO:	
NAME:	MR. AL Romero
LOCATION:	NMHLEA 1-827-2836
THIS MESSAGE	
NAME:	Gretchen Von Boren
	Thank you for your help
TOTAL NUMBER	of pages including this sheet: