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June 4, 1991

Mr. Bill Honker, 6H-P  
Chief, RCRA Permits Branch  
U.S. Environmental Protection Agency  
1445 Ross Ave., Suite 1200  
Dallas, Texas 75202

RE: Holloman Air Force Base permit

Dear Mr. Honker:

Enclosed is the operating permit for the management of hazardous waste in the container storage facility at Holloman Air Force Base. Also included are the comments from the U.S. Environmental Protection Agency, Region 6 and the New Mexico Environment Department received during the comment period on the draft permit.

If you have any questions, please contact Dr. A. Elizabeth Gordon on the Hazardous and Radioactive Waste Bureau staff at (505) 827-2926.

Sincerely,

*JME* Judith M. Espinosa  
Secretary

Enclosures (2):      Operating permit  
                                 Response-to-comments letter

JME/DE/de

**Response to comments on the Hazardous Waste Storage Permit for Holloman Air Force Base.**

The New Mexico Environment Department proposed to issue a permit to Holloman Air Force Base for storage of hazardous waste in containers. The draft permit was submitted for public comment from February 11, 1991 to March 28, 1991. This letter contains responses to comments received from: U.S. Environmental Protection Agency-Region 6; New Mexico Hazardous and Radioactive Waste Bureau.

**Comments from U.S. Environmental Protection Agency-Region 6**

1. **Comment:** There are several provisions in the draft permit which mention the 40 CFR requirements (e.g., HWMR-5, Pt. IX, Sec.270.30(c)). However, there is no indication in the permit which 40 CFR regulations are effective for this permit. This needs to be clarified in the permit. **Permit modification:** A copy of the New Mexico Hazardous Waste Management Regulations which incorporate 40 CFR by reference will be included in the permit.

**Comments from the Hazardous and Radioactive Waste Bureau**

1. **Comment, Response and Permit modification:** The new revision of the New Mexico Hazardous Waste Management Regulations (HWMR-6) became effective on March 13, 1991 and superseded HWMR-5, as amended 1989. All references to HWMR-5 have been replaced with references to HWMR-6.

2. **Comment:** The Compliance & Enforcement/Hydrogeology Section would like the inclusion of a brief contingency section on groundwater monitoring. **Response:** Storage facilities are not required to address groundwater requirements. However, they are required to address releases and the Permit details the required actions and reports. However, to emphasize the concern the Section has for any release that could impact groundwater, a section on releases that refers the Permittee to the appropriate sections of the Permit has been added. **Permit modification:** The following was added to Module II of the Permit:

**II.M. REQUIREMENTS FOR RELEASES**

**II.M.1. Releases from the Container Storage Area**

If, based on information contained in reports required by Module I, Permit Conditions I.E.13.a., b. and c., the Secretary determines that a release from the container storage area is of such a quantity, duration or repeated occurrence that further assessment is required, he may direct the Permittee to conduct the sampling and analysis

required pursuant to HWMR-6, Pt. IX, sec. 270.14(d).

II.M.2. Releases from Newly Identified Solid Waste Management Units (SWMUs)

For newly identified SWMUs, the Permittee shall fulfill the requirements of Module IV, Permit Condition IV.E.