FROM: 49 CES/CEV

SUBJ: Resource Conservation and Recovery Act (RCRA) Part B Modification Treatment, Storage, and Disposal Facility (TSDF) Operating Permit NM6572124422-1

TO: New Mexico Environment Department
Hazardous and Radioactive Materials Bureau
Attn: Ms Barbara Hoditchek
525 Camino de Los Marquez
P.O. Box 26110
Santa Fe, NM 87502

1. Holloman AFB (HAFB) requests determination of the type of Class (1, 2, or 3) modification for our permitted storage facility at the Defense Reutilization and Marketing Office (DRMO) for the following items:

   a. A construction project will begin 29 Oct 93 to demolish the outside storage area and replace with a new diked concrete pad (same size as the old one) and add a pre-engineered metal cover.

   b. Under container management (page B-10), HAFB would like to propose a decreased schedule of equipment on hand which would suffice for our type of operations.

   c. Forms need updating.

   d. Under container management, "Containers with Free Liquids"; HAFB would like the permit to allow rags and spill debris to not be classified as drums of liquid waste.

   e. DRMO receives hazardous materials (HM) for re-sale. However, 95 percent of the HM does not sell and is then funded as hazardous waste (HW). The contractor, through DRMO, is responsible for containerizing/lab packing the HM prior to shipment. Under "Description of Containers" (page B-5), the second sentence reads: "...all waste will be in Department of Transportation (DOT) containers." HAFB would like to change this so the HM that turns to HW does not have to be in DOT specification packagings but rather will be in manufacturer packaging.

   f. Names, office symbols, and phone numbers need to be updated. Additionally, the base has a new Wing Commander.

2. Request paragraph 1.a. above be worked as soon as possible since the project has been awarded and is on schedule. Paragraphs b-f can be worked with New Mexico Environment Department as time permits. If it would be easier to sit down and discuss these modifications, we can arrange for several people familiar with the operations to come to Santa Fe.

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3. To prevent disruption of ongoing Hazardous Waste Management at our TSDF during construction/repair of the outside storage, the base requests a temporary authorization to store all Class 9 waste in the staging area just outside the TSDF. This area is diked and has a sump for any spills or leaks. If this is not acceptable, please advise.

4. If there are any questions or additional information is required, please contact Ms Cathy Giblin at 475-5040.

cc: DRMO-WIC

HOWARD E. MOFFITT
Deputy Base Civil Engineer