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Howard E. Moffitt
Deputy Base Civil Engineer
Headquarters 49th Fighter Wing (ACC)
Holoman Air Force Base, New Mexico

RE: RCRA Part B Modification for Treatment, Storage, and Disposal Facility (TSDF) Operating Permit NM6572124422-1

Dear Mr. Moffitt:

The Hazardous and Radiologic Material Bureau of the New Mexico Environment Department has reviewed your request for a modification to Holoman Air Force Base's Operatine Permit and made the following determinations.

1.a. Your construction project ^{describe} is a Class I Modification. There are however questions that need to be answered.

1. How long any containers temporarily removed from the site would have to stay in their temporary area?
2. What is the maximum number of containers in storage (anticipated) at any one time?
3. Is this temporary site constructed with the proper berms and dikes to prevent environmental contamination should a leak occur? As required under HWMR-7 Section 40 CFR 264.175.
4. Is there any record of spills on the old site you are replacing?
 - a. If there is a record of a spill then an analysis of the construction material to be disposed of should be completed and the construction material treated according to the results of that analysis.
 - b. If there is a record of a spill then the soil below the pad should also be analyzed for contamination.
 - c. A remediation plan should be submitted and approved by the New Mexico Environment Department for a. and b. above should analysis show any contamination above health based action levels.
5. What is the estimated date of completion of the construction project? Please send us a project schedual.

- 1.b. The HRMB requires a more detailed explanation of the equipment you would like to delete from the required equipment list. When that information is received the HRMB will make a determination as to the modification class.
- 1.c. The HRMB requires that more detailed information and copies of forms you would like to update be submitted. If these are forms that are in need of regular updating say every six months that might need to be addressed in a different manner than recurring modifications. Again once we have received that information a determination of the class of modification will be made.
- 1.d. After review of you permit the HRMB did not find your point of contention "Containers with Free Liquids". What the HRMB did find was in Module III.B.3.b. which states that, "Each container must be clearly marked as to its contents an the date each period of accumulation begins." If you could provide this office with specific literature citation where your point of contention comes from we would be better informed and able to correct the problem.
- 1.e. Your request for modification varying from DOT Approved Containers that are now required needs questions answered before a Modification Class determination can be made.
 1. A specific definition is needed for the type of containment you are considering.
 2. A specific description of the container(s) to be used for each type of waste.
 3. A description of the longest period of time (outside time period) that each of these containers would be expected to achieve holding each type of waste.
 4. A specific inspection schedule for the containers in question. See 40 CFR 264.15.
 5. A specific inspection schedule for the DRMO as a whole.
- 1.f. Changes in office symbols, phone numbers or Commanders is a Class I Modification. However if properly addressed in this modification could be covered in another manner that would not require a Modification Request with each change. ?

Once this information is received a determination of the Modification Class will be made.

The HMRB would also like for you to submit your original Part B information on a 3.5" IBM Format Word Perfect 5.2. This would greatly speed the process of modifying.

Please contact Robert S. (Stu) Dinwiddie of my staff at (505) 827-4308 if you have any questions or would like to discuss the modification process.

Sincerely,

~~Kathlene Sisneros~~ *Barbara Hoditschek, Program Manager*
RNA Permits

cc: ~~Barbara Hoditschek~~
Robert S. (Stu) Dinwiddie
Red File