



DEPARTMENT OF THE AIR FORCE

HEADQUARTERS 49TH FIGHTER WING (ACC)
HOLLOMAN AIR FORCE BASE, NEW MEXICO

08 JUN 1994

MEMORANDUM FOR New Mexico Environment Department (NMED)
Hazardous and Radioactive Materials Bureau
Attn: Barbara Hoditschek
525 Camino De Los Marquez
P.O. Box 26110
Santa Fe, NM 87502



FROM: 49 CES/CEV
550 Tabosa Ave
Holloman AFB, NM 88330-8458

SUBJECT: Resource Conservation and Recovery Act (RCRA) Operating
Permit NM6572124422-1

1. Holloman AFB (HAFB) is still in pursuit of performing a modification to the subject permit. We are still interested in taking care of the upgraded outside storage pad. Your office had several concerns with this construction. Answers to your questions are as follows:

a. How will HAFB manage containers which normally occupy this pad while demolition and reconstruction take place?

The outside storage pad has not been used for hazardous waste storage even though we are permitted to do so. Past practices have been to store used oil, used antifreeze and lead acid batteries waiting for recycling. These items have been taken to another area within Defense Reutilization and Marketing Office (DRMO) and are sitting on a concrete pad with walls on three sides. To keep the inside storage from getting over crowded, we are storing drums on the loading/unloading pad just outside the Temporary, Storage and Disposal Facility (TSDF). This area will only store solid Class 9 waste such as rags or spill debris. We will not and have not been storing any liquids in this area.

b. How long will any containers, temporarily removed from the site, have to stay in their temporary area?

The drums being stored on this pad, just outside the TSDF, will be there no longer than 4-8 weeks. DRMO's contract comes to the base at this interval. At this time, DRMO continues taking drums again.

c. What is the maximum number of containers in storage (anticipated) at any one time?

The loading/unloading pad can have up to 70-80 drums on it by the time the Hazardous Waste contractor shows up. (As stated earlier, every 4-8 weeks).

d. Is this temporary site constructed with the proper berms and dikes to prevent environmental contamination, should a leak occur, as required under HWMR-7, 40 CFR 264.175? Please provide documentation.

The temporary site is a part of the TSDF in which the normal use of the pad is for loading and unloading of waste. It has a 2"-3" concrete berm with a ramp on one side and a sump on another (see Attachment 1 for drawings and pictures of this area). There were never any spills that needed to implement the contingency plan; however, a few years ago a quart of paint spilled, it was cleaned up and immediately reported to the Fire Department. As stated in para a. above this area will temporarily store only Class 9 waste such as spill debris and rags.

e. Is there any record of spills on the old pad you are replacing? If so, did HAFB follow the contingency plan as specified in the Operating Permit?

When the outside storage was in use and storing used oil, used antifreeze, and lead acid batteries, only small spills occurred which were not a reportable quantity or enough to implement the contingency plan. When spills occurred, they were cleaned up immediately. No record was kept on these non-hazardous spills.

f. What is the estimated date of completion of the construction project? Please send us a project schedule.

At this time, the project is complete; however, we are having problems with the seal on the concrete floor. The contractor did not apply the coating properly and has been told to redo the seal coat. There is no date as to when this will be accomplished. HAFB will not use the pad until the coating has been applied properly and NMED is satisfied with the permit modification (see Attachment 2 for construction drawings).

2. If you have any questions, please contact Cathy Giblin at 475-5040.


HOWARD E. MOFFITT
Deputy Base Civil Engineer

Attachments

1. TSDF Drawings/Pictures
2. Construction Drawings, Outside Storage

cc: w/o Atchs
Johnny Rasnick, DRMO-WIC