State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
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CERTIFIED MAIL

RETURN RECEIPT REQUESTED

ENTERED

September 7, 1995

Howard E. Moffitt
Deputy Base Civil Engineer
49 CES\CEV
550 Tabosa Ave
Holloman AFB, N.M. 88330-8458

SUBJECT: Notice of Technical Deficiency (NOD) - Holloman Air Force Base 20,000-Pound Open Detonation Unit Permit Application.

Dear Mr. Moffitt:

The Hazardous and Radioactive Material Bureau (HRMB) of the New Mexico Environment Department (NMED) has reviewed for technical adequacy, the October 1992, Holloman Air Force Base 20,000-Pound Open Detonation Unit Permit Application, required under the Resource Conservation and Recovery Act (RCRA). This permit application describes the operation and maintenance of a hazardous waste treatment facility.

HRMB has found the Permit application to be technically deficient. The enclosed attachment A lists the requested information necessary for HRMB to complete the procesing of this permit application. In keeping with HRMB policy you are requested to highlight changes to the permit application by striking out and shading the items to be deleted and using shading for the material that has been added. Please submit the highlighted and struckout changes to the permit application along with the requested information on a 3.5" disk compatible with WP 5.2, to HRMB within 30 days of receipt of this letter. Failure to submit the information within this designated time will result in a delay in the processing of this application and/or the issuance of a Notice of Violation (NOV). If you feel that 30 days will not be sufficient to respond to this NOD, we will consider a petition to extend the deadline for portions of the required information if you provide a written justification and expected submittal date for each portion.

If necessary, a meeting on this NOD can be scheduled if complete understanding of what HRMB is requiring is not clear. If you have any questions concerning this NOD please contact Charles Lundstrom of my staff at (505) 827-1561.

Sincerely,

Benito J. Garcia, Bureau Chief
Hazardous and Radioactive Materials Bureau

Attachment (1)

xc: Barbara Hoditschek, HRMB Permitting
Ron Kern, HRMB
David Neleigh, Chief 6HPN EPA Region 6
Steve Pullen, HRMB
File: HAFB Red 1995
File: Reading

ATTACHMENT A

Notice of Deficiency Items Technical Completeness Review

September 7, 1995

I. **A. Facility Description**

Topographic Map as required in 20 NMAC 4.1(effective September 23, 1994), Subpart IX, 40 CFR 270.14(b)(19).

The permit application must include a map or maps that:

1. show the terrain for a distance of 1,000 feet outside the unit at a map scale of 1 inch equal to not more than 200 feet with appropriate contour lines;

2. show surrounding land uses;

3. show engineering drawings to scale of open detonation unit;

4. show distances to property boundaries, buildings on and off-site, public roadways, and distance to passenger railroads;

5. provide information about waste transfer or pick-up stations;

6. provide information about quantity of waste moved per movement per vehicle;

7. show wind rose for at least five most recent years;

II. **B. Closure and Post-closure plans**

Closure plan documentation as required in 20 NMAC 4.1 (effective September 23, 1994), Subpart IX, 40 CFR 270.14(b)(13).

The permit application must include a closure plan that includes:

1. methods for sampling and testing surrounding soils;

2. criteria for determining decontamination levels;

3. description of additional activities performed during closure;

4. location(s) and number of copies of closure plan(s);

5. Identification of person responsible for storage and updating of facility copy of closure plan;

6. Procedure(s) for updating all other copies of closure plan;

III. C. Protection of Ground Water

Additional Information requirements as required by 20 NMAC (effective September 23, 1994), Subpart IX, 40 CFR 265.90 (c)

If HAFB wishes to pursue a ground water monitoring waiver, HAFB must satisfy all applicable regulations listed below, CFR 265.90 (c) and submit this waiver to HRMB within the timelines outlined above for review.

1. All or part of the ground water monitoring requirements of this subpart may be waived if the owner can demonstrate that there is a low potential for migration of hazardous waste or hazardous waste constituents from the facility via the uppermost aquifer to water supply wells (domestic, industrial, or agricultural) or to surface water. This demonstration must be in writing and must be kept at the facility. This demonstration must be certified by a qualified geologist or geotechnical engineer and must establish the following:

   (1) The potential for migration of hazardous waste or hazardous waste constituents from the facility to the uppermost aquifer, by an evaluation of :

(i) a water balance of precipitation, evapotranspiration, runoff, infiltration; and

(ii) unsaturated zone characteristics (i,e., geologic materials, physical properties, and depth to ground water); and

(2) The potential for hazardous waste or hazardous waste constituents which enter the uppermost aquifer to migrate to a water supply well or surface water, by an evaluation of :

(i) saturated zone characteristics (i.e., geologic materials, physical materials physical properties, and rate of ground-water flow); and

(ii) the proximity of the facility to water supply wells or surface water.

IV. D. Open Detonation on the Ground Surface

Information on engineering plan and drawings of the OD unit as required by 20 NMAC (effective September 23, 1994), Subpart IX 40 CFR 270.23 (a)(2).

1. To determine design specifications and dimensions, the drawings must include how the edges of the OB unit are demarcated.

2. A copy of the Standard Operating Procedure (SOP) for the Open detonation unit.