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PETER MAGGIORE
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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

April 22, 1999

Howard E. Moffitt
Deputy Base Civil Engineer
49 CES/CEV; 550 Tabosa Ave
Holloman Air Force Base, N.M. 88330-8458



**SUBJECT: Container Storage Unit: Permit Renewal Application, Request for Supplementary Information (RSI)
EPA ID No. NM6572124422**

Dear Mr. Moffitt:

The Hazardous and Radioactive Materials Bureau (**HRMB**) of the New Mexico Environment Department (**NMED**) has reviewed for technical adequacy the Holloman Air Force Base (**HAFB**) Container Storage Permit renewal application of July 1997, as required under the New Mexico Hazardous Waste Management Regulations 20 NMAC 4.1.

Pursuant to its authority under the New Mexico Hazardous Waste Act, N.M.S.A. 74-4-1 et seq., and regulations promulgated pursuant thereto, the HRMB has found the subject application to be technically incomplete. The enclosed attachment lists the required information necessary for HRMB to declare the Permit application technically adequate, and to commence drafting the Permit.

Please submit the requested information within thirty (30) calendar days from the date you receive this RSI. The HRMB may consider a petition for a deadline extension, provided that a written justification and the expected submittal time are given.

Please present the required information in two hard copies and on a 3.5" diskette compatible with Word Perfect for Windows 5.2 or 6.1.

Mr. Moffitt, HAFB

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If you have any questions please call Steve Pullen, Cornelius Amindyas or Julie Wanslow at (505) 827-1561.

Sincerely,



Robert S. (Stu) Dinwiddie, Manager
RCRA Permits Management Program
Hazardous and Radioactive Materials Bureau

Enclosure

cc: Benito J. Garcia, Chief, HRMB
David Neleigh, Chief, EPA Region VI (6PD-N)
Steve Pullen, HRMB
Julie Wanslow, HRMB
Cornelius Amindyas, HRMB

FILE: Red, 99

TRACK: HAFB, 4/22/99, HAFB, HRMB/CA, RSI, Container Storage Permit Renewal Application.

REQUEST FOR SUPPLEMENTARY INFORMATION:

HAFB CONTAINER STORAGE PERMIT RENEWAL APPLICATION

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The following technical comments from Hazardous and Radioactive Materials Bureau (HRMB) relate to the HAFB Permit renewal application dated July 1997.

The quotations in bold are taken directly from the application text.

1) Section B-3, Page B-5: **“Topographic Map”**:

The topographic map (scale, 1:62,500), that HAFB incorporated into Part A Permit application and Figure B-3 do not satisfy the requirements of New Mexico Hazardous Waste Management Regulations. The purpose of the topographic map is to understand surface water drainage patterns. Please submit to HRMB, a topographic map which :

Shows the terrain for a distance of 1,000 feet (radius) outside the Container Storage Unit (CSU), at a map scale of 1 inch equal to not more than 200 feet, with appropriate contour lines shown on the map, as per 20 NMAC 4.1.900 incorporating 40 CFR §270.14(b)(19). Indicate the location of the CSU.

2) **“Waste Analysis Plan [WAP] - Section C”**:

WAP does not satisfy the requirements of 40 CFR §264.13. The WAP does not clearly indicate if Holloman has obtained a detailed chemical and physical analysis of a representative sample of each waste stream which includes at a minimum all the information which must be known to treat, store, or dispose of the waste in accordance with 40 CFR Part 264 and Part 268 as required by 40 CFR §264.13(a)(1). In other words, the WAP does not provide all the information that must be known to ensure that the appropriate RCRA waste codes are applied to each waste stream, ensure that the waste is managed in compliance with the waste management requirements of 40 CFR §264, and the Land Disposal Restriction (LDR) treatment standards of 40 CFR §268.

- the WAP does not identify the specific waste streams that will be characterized based on process knowledge;
- the WAP does not provide historical analytical data and those waste streams that will be characterized by direct analyses;
- the WAP does not indicate how often Holloman will review or repeat the initial analyses for each waste stream as required by 40 CFR §264.13(b)(4);

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- the WAP does not describe how Holloman will determine that the process or operation generating the waste stream has changed as required by 40 CFR §264.13(a)(3)(i);
- the WAP does not describe how Holloman will ensure safe management of ignitable, reactive, and incompatible wastes in specified by 40 CFR §264.17;
- the WAP does not describe how Holloman will meet the LDR waste analysis and record keeping requirements of 40 CFR §264.7 for each waste stream as required by 40 CFR §264.13(b)(6);
- the WAP does not specify the associated parameters and rationale required by 40 CFR §264.13(b)(1);
- the WAP does not specify the test methods required by 40 CFR §264.13(b)(2), for each waste stream; and
- the WAP does not specify the sampling methods required by 40 CFR §264.13(b)(3) for each waste stream.

Please revise the WAP to address the deficiencies identified in the preceding two paragraphs to ensure compliance with the requirements of 40 CFR §264.13, as follows:

- a. Revise the WAP to follow the outline identified in Table 4-7 in the EPA document titled: Waste Analysis at Facilities that Generate, Treat, Store, and Dispose of Hazardous Wastes: A Guidance Manual, April 1994. Provide the information recommended by the EPA WAP Guidance Manual. Use the sample WAPs in Part Four for guidance on content and level of detail.
- b. Provide in table format a summary of the waste characterization information for each waste stream. Clearly indicate those waste streams that will be characterized based on process-knowledge or historical analytical data and those waste streams that will be characterized based on direct analyses of the waste after it is generated. See Table 4-8 in the EPA WAP Guidance Manual.

Provide a table that contains information summarizing the hazardous waste code determination. Include in this table the following information for each specific waste stream:

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- name of specific waste stream,
- process generating the waste stream,
- basis for EPA waste code classification (e.g., knowledge, historical analytical data, testing),
- parameters of concern,
- EPA waste codes,
- analytical test methods (if the waste is tested),
- sampling frequency (for repeating the initial analysis of the waste),
- review frequency (for reviewing the process or operation generating the waste),
- hazardous properties of the waste (e.g., toxic, ignitable, reactive, corrosive), and
- chemical analyses (e.g., maximum concentration of chemicals).

Provide a second table that contains information summarizing compliance with LDR. Include in this table the following information for each specific waste stream:

- name of specific waste stream,
- EPA waste codes,
- LDR category (e.g., nonwastewater or wastewater),
- basis for LDR classification (e.g., knowledge of the waste, testing),
- parameters of concern (including LDR constituents such as underlying constituents),

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- analytical test methods to ensure compliance with LDR (if the waste is tested for LDR purposes),
 - sampling frequency (for repeating the initial analysis of the waste for ensuring the waste analysis is accurate and up-to-date),
 - review frequency (for reviewing the process or operation generating the waste to ensure the waste analysis is accurate and up-to-date),
 - chemical analysis (e.g., maximum concentration of chemicals), and
 - LDR treatment standard (concentration, technology code, or alternative treatment standard of 40 CFR §268.45).
- c. Provide a table that contains information summarizing the sample collection requirements. See Table 4-10 in the EPA WAP Guidance Manual. Include in this table the following:
- name of the specific waste stream,
 - EPA waste codes,
 - sample collection methods,
 - sample type for hazardous waste determination (i.e., grab or composite),
 - sample type for ensuring compliance with LDR treatment standards (i.e., grab or composite),
 - sampling equipment, and
 - sample preservation and storage.
- d. If all or part of the hazardous waste determination or compliance with the LDR treatment standards is based on process-knowledge or historical analytical data (instead of testing), provide the following information for each waste stream:
- documentation of the process-knowledge,

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- table summary of all historical analytical data,
 - explanation of how Holloman tracks and documents the process knowledge or historical analytical data,
 - explanation of how and when Holloman reviews and updates the process knowledge or historical analytical data, and
 - examples of the auditable documentation that is used to help implement the review and update of the process knowledge and historical analytical (e.g., procedure for assigning hazardous waste codes and ensuring compliance with LDR treatment standards for each waste stream, procedure for resolving discrepancies in the waste analysis documentation, procedure for confirming the process knowledge or historical analytical data, annual review checklists).
- e. Explain how the waste is tracked from the time it is generated to the time it leaves the permitted storage unit. Specify how Holloman reviews, documents, and updates the waste analysis information to ensure that each container of waste is characterized accurately and is up-to-date. Provide examples of the tracking documents (e.g., waste profile forms, container labels, bar codes).
- f. Provide a sampling quality assurance/quality control (QA/QC) program and an example chain-of-custody form.
- 3) Please provide information about the storage and management of material released at the CSU. This information is in the current operating Permit, but is missing from the Permit renewal application. Please incorporate that information into your response. Discuss the post-emergency equipment maintenance at the CSU.
- 4) Describe how the Containment Building leaks will be managed and repaired, and the certification following repair of the building, to comply with the requirements specified by 40 CFR §264.1102.
- 5) **“Closure Plan - Section K-1”**: Time allowed for Closure:
- Provide information on the time allowed for closure, and HAFB’s plans to request for extension of closure time/activities beyond the regulatory 180 calendar days stipulated in 40 CFR §264.113.

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- 6) Please submit a discussion regarding the necessity for Emission Monitoring Plan (**EMP**) for both Method 21 (40 CFR §264 Subpart CC) and control device monitoring methods. If you decide that an EMP is necessary, please provide it. The plan should include the following:
 - 1) monitoring points;
 - 2) monitoring methods for control devices;
 - 3) monitoring frequency;
 - 4) procedures for documenting exceedances; and
 - 5) procedures for mitigating noncompliances.

- 7) **“Contingency Plan - Section H”**:

Although the current operating Permit contains (Page E-7) information on coordinating agreements with other organizations, that information was omitted from the Permit renewal application. Please provide information on arrangements with local authorities for potential needs of other organizations during emergencies at, and around HAFB, as required by 20 NMAC 4.1.500 incorporating 40 CFR §264.37.

- 8) Provide a detailed discussion on emergency response procedures, identification of hazardous waste, hazard assessment, and control procedures. [This information, which can be found in the current operational Permit was not included in the Permit renewal application].