



DEPARTMENT OF THE AIR FORCE

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

28 JUL 1999

MEMORANDUM FOR NEW MEXICO ENVIRONMENT DEPARTMENT

Attn: Mr. Robert S. (Stu) Dinwiddie
Hazardous & Radioactive Materials Bureau
PO Box 26110
Santa Fe, NM 87502

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



SUBJECT: Request for Time Extension Regarding Supplementary Information for the
Container Storage Facility Permit Application EPA ID No. NM6572124422

- Holloman AFB requests another 30-day extension to the new deadline of 4 Aug 99 regarding requested Supplementary Information (SI) for subject application. We also need you to provide us more specific regulatory citations that are driving your request for SI. As planned, we met with you and your staff on 4 Jun 99 and provided our proposal for resolving the deficiencies you identified (Atch 1). Unfortunately, we were unable to resolve certain issues related to the Waste Analysis Plan (WAP) portion of the application. We continue to believe our proposal meets the requirements of the 40 CFR 264.13 specific to the WAP. We subsequently received a phone call from your staff on 15 Jun 99 followed by your 29 Jun 99 letter directing us to complete the WAP sections as outlined in your 22 Apr 99 letter. These unresolved WAP issues remain a problem.
- The items detailed in Atch 1 show how we propose to resolve certain WAP issues. Some issues, identified with a "D" in the respondent column, indicate that we feel they are not required by regulation. We agree that the WAP should contain all items required by regulation, but we disagree that each item in your 22 Apr 99 letter is a regulatory requirement. We were also recently advised by EPA Region VI to work with you to limit our permit requirements to actual regulatory requirements. We suggest involving our respective attorneys if interpretation of the regulation is at issue.
- If you have any questions, please call Ms. Debbie Hartell at (505) 475-3931.

Howard E. Moffitt
HOWARD E. MOFFITT
Deputy Base Civil Engineer

Attachment:
Holloman AFB Comments on Request for Supplementary Information

cc:
US EPA, Region VI (w/o Atch)
Attn: Mr. David Neleigh, Chief
1445 Ross Ave (6PD-N)
Dallas, TX 75202-2733

NMED (w/Atch)
Attn: Mr. Cornelius Amindyas
Hazardous and Radioactive Materials Bureau
P O Box 26110
Santa Fe, NM 87502

**Comments on:
REQUEST FOR SUPPLEMENTARY INFORMATION
HAFB CONTAINER STORAGE PERMIT RENEWAL APPLICATION
1 June 1999**

Respondent: Holloman AFB

1. Respondent concurs (C), does not concur (D), or takes exception (E).
2. Commentor Agrees (A) with response, or does not agree (D) with response.

Comment #	Section/ Page	Paragraph/ Line	Comment	C, D, E ¹	Response	A or D ²
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, <u>with appropriate contour lines shown on the map</u> , as per 20 NMAC 4.1.900 incorporating 40 CFR §270.14(b)(19). Indicate the location of the CSU.	C	A topographic map will be provided for submittal with both the Part A (Figure B-3, Page B-5) and Part B (Figure B-3, Page B-6) of the permit application that shows a distance of 1000 feet around the facility at a scale of 1 inch equal to not more than 200 feet. The contours shown on the map will be at a sufficient interval to clearly show the pattern of surface water flow in the vicinity of and from each operational unit of the facility, and the location of the CSU will be identified in accordance with 40 CFR §270.14(b)(19).	A - NMED concurs with response.

Atch 1

Response to Comments (continued)

Comment #	Section/ Page	Paragraph/ Line	Comment	C, D, E ¹	Response	A or D ²
2.	Section C: Waste Analysis Plan		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.	C	See response to comments below. A copy of the revised WAP, including highlighted revisions, has been included in this submittal for review for proposed inclusion into the Permit Application.	
			<ul style="list-style-type: none"> • the WAP does not identify the specific waste streams that will be characterized based on process knowledge; 	D	A description of the approach for characterizing waste streams generated by Holloman AFB based on process knowledge is presented in revised Sections C-2, <i>Waste Analysis Approach</i> , and C-2.1, <i>Identification/EPA Classification of the Hazardous Waste Managed</i> , of the Permit Application in accordance with 40 CFR 264.13(a)(1) and (2). Federal and NM State regulations do not require that the <u>specific</u> waste streams characterized based on process knowledge be identified, as such Holloman AFB has fulfilled the regulatory requirements and it is not necessary to incorporate this information into its Permit Application.	D - NMED to discuss internally whether they still want to see this information presented in table format. NMED will communicate with HAFB more on this issue.

Response to Comments (continued)

Comment #	Section/ Page	Paragraph/ Line	Comment	C, D, E ¹	Response	A or D ²
2. cont.			<ul style="list-style-type: none"> the WAP does not provide historical analytical data and those waste streams that will be characterized by direct analyses; 	D	<p>A description of the approach for characterizing waste streams generated by Holloman AFB based on analytical data or direct analysis is presented in revised Sections C-3, <i>Selecting Waste Analysis Parameters</i>, of the Permit Application in accordance with 40 CFR 264.13(a)(1) and (2). As stated above, this information satisfies the regulatory requirements.</p>	<p>D - NMED to discuss internally whether they still want to see this information presented in table format. NMED will communicate with HAFB more on this issue.</p>
			<ul style="list-style-type: none"> 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); 	D	<p>Neither the federal nor state regulations specify certain time intervals for re-evaluating wastes. The regulations state that "waste analysis must be repeated as often as necessary to ensure that it is accurate and up to date." The regulatory criteria for determining when additional analysis is necessary are based on changes in the process or operation generating the waste or need to determine whether waste received from off-site matches the waste manifest. Even though the regulatory guidance recommends development of a schedule for re-evaluation of the waste on a regular basis, this action is not required by the regulations. The regulations set out performance criteria under which waste re-evaluations must be conducted. Holloman AFB's WAP is in accordance with the requirements of the regulations. Individualized assessments will be conducted by trained base personnel to ensure compliance with the regulatory performance criteria and the terms of the Part B permit. See Section C-2 of the WAP for a discussion of the rationale and procedures proposed for Holloman CSU operations.</p>	<p>D - NMED requests that annual verification sampling be conducted on all waste streams. HAFB will provide NMED with information on the number and volumes of waste streams generated. NMED may consider annual verification sampling on a waste volume basis (i.e., larger waste streams requiring annual sampling/ smaller waste streams less frequently).</p>

Response to Comments (continued)

Comment #	Section/ Page	Paragraph/ Line	Comment	C, D, E ¹	Response	A or D ²
2. cont.			<ul style="list-style-type: none"> 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); 	D	Revised Permit Application Section C-2, <i>Waste Analysis Approach</i> , presents discussion in the second paragraph of this section describing the criteria for which Holloman AFB determines when analysis or repeat analysis of a waste is necessary as required by 40 CFR §264.13(a)(3)(i).	D - NMED to discuss internally whether they still want to see this information presented in table format. NMED will communicate with HAFB more on this issue.
			<ul style="list-style-type: none"> the WAP does not describe how Holloman will ensure safe management of ignitable, reactive, and incompatible wastes as specified by 40 CFR §264.17; 	C	Section C-3.2.1, <i>Ignitable, Reactive, and Incompatible Wastes</i> , has been added to the Permit Application to satisfy the requirements of 40 CFR §264.17. Procedures for the safe management of these wastes are outlined in Section D-5 of the Permit Application, and are referenced in the WAP to prevent unnecessary duplication of information.	C - NMED concurs with response, but had not reviewed the revised WAP at the time of the meeting.
			<ul style="list-style-type: none"> 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); 	C	Section C-3.2.2, <i>Land Disposal Restrictions</i> , has been added to the Permit Application to satisfy the requirements of 40 CFR §264.13(b)(6) and 40 CFR §268.7.	C - NMED concurs with response, but had not reviewed the revised WAP at the time of the meeting.
			<ul style="list-style-type: none"> the WAP does not specify the associated parameters and rationale required by 40 CFR §264.13(b)(1); 	D	Table C-1, <i>Major Waste Categories and Parameters of Concern</i> , and Revised Section C-3.1, <i>Criteria and Rationale for Parameter Selection</i> , of the Permit Application identifies the parameters for which each hazardous waste will be identified and the rationale for the selection of these parameters, respectively, in accordance with 40 CFR §264.13(b)(1).	D - NMED to discuss internally whether they still want to see this information presented in table format. NMED will communicate with HAFB more on this issue.

Response to Comments (continued)

Comment #	Section/ Page	Paragraph/ Line	Comment	C, D, E ¹	Response	A or D ²
2. cont.			<ul style="list-style-type: none"> the WAP does not specify the test methods required by 40 CFR §264.13(b)(2), for each waste stream; and 	D	Table C-1, <i>Major Waste Categories and Parameters of Concern</i> , of the Permit Application identifies the analytical methods for which each hazardous waste will be tested for its parameters of concern in accordance with 40 CFR §264.13(b)(2).	D - NMED to discuss internally whether they still want to see this information presented in table format. NMED will communicate with HAFB more on this issue.
			<ul style="list-style-type: none"> the WAP does not specify the sampling methods required by 40 CFR §264.13(b)(3) for each waste stream. 	D	Holloman AFB's WAP specifies testing and analytical methods as prescribed in the regulations and presented in EPA guidance. See 40 CFR § 264.13(b)(3)(i) & (ii); Guidance Manual § 2.4.2, pp. 2-40 & 2-42. The methods selected are appropriate for the particular waste category, considering the physical state of the waste and parameters of concern. Table C-1 presents the analytical test methods that have been selected for each waste category. The regulations do not require selection of sampling equipment in addition to the sampling method. Including this information in Holloman AFB's permit application will place an unnecessary burden on the CSU facility and could work to undermine future best waste management practices. Incorporation of unnecessary specific details from guidance documents could prevent Holloman AFB from following the most current agency recommendations without amending its Part B permit.	D - NMED to discuss internally whether they still want to see this information presented in table format. NMED will communicate with HAFB more on this issue.
			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:		See response to comments below.	

Response to Comments (continued)

Comment #	Section/ Page	Paragraph/ Line	Comment	C, D, E ¹	Response	A or D ²
2. a.	Section C: Waste Analysis Plan		Revise the WAP to follow the outline identified in Table 4-7 in the EPA document titled: <i>Waste Analysis at Facilities that Generate, Treat, Store, and Dispose of Hazardous Wastes: A Guidance Manual, April 1994</i> . Provide information recommended by the EPA WAP Guidance Manual. Use the sample WAPs in Part Four for guidance on content and level of detail.	C	<p>The WAP has been revised to follow the format and recommendations outlined in the referenced guidance document, to the extent practicable. The outline of the revised WAP is as follows:</p> <ul style="list-style-type: none"> • C-1 Introduction • C-2 Waste Analysis Approach <ul style="list-style-type: none"> - C-2.1 Identification/EPA Classification of the Hazardous Waste Managed • C-3 Selecting Waste Analysis Parameters <ul style="list-style-type: none"> - C-3.1 Criteria and Rationale for Parameter Selection - C-3.2 Special Parameter Selection and Procedural Requirements • C-4 Sampling and Analysis Plan <ul style="list-style-type: none"> - C-4.1 Objectives - C-4.2 Sampling Procedures and Methodology - C-4.3 Health and Safety Procedures - C-4.4 Sampling QA/QC Procedures - C-4.5 Sample Container and Preservation Requirements - C-4.6 Laboratory Analysis <p>A copy of the revised WAP, including highlighted revisions, has been included in this submittal for review for proposed inclusion into the Permit Application.</p>	NMED had not completely reviewed the revised WAP at the time of the meeting. They will provide HAFB with additional comments once the review is complete.

Response to Comments (continued)

Comment #	Section/ Page	Paragraph/ Line	Comment	C, D, E ¹	Response	A or D ²
2. b.	Section C: Waste Analysis Plan		<p>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.</p> <p>Provide a table that contains information summarizing the hazardous waste code determination. Include in this table the following information for each specific waste stream:</p> <ul style="list-style-type: none"> • 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 concentrations of chemicals). 	D	Table C-1, <i>Major Waste Categories and Parameters of Concern</i> , and the revised WAP satisfy the requirements of 40 §264.13, as such Holloman AFB has fulfilled the regulatory requirements and it is not necessary to incorporate this table into its Permit Application.	D - NMED to discuss internally whether they still want to see this information presented in table format. NMED will communicate with HAFB more on this issue.

Response to Comments (continued)

Comment #	Section/ Page	Paragraph/ Line	Comment	C, D, E ¹	Response	A or D ²
2. b. cont.			<p>Provide a second table that contains information summarizing compliance with LDR. Include in this table the following information for each specific waste stream:</p> <ul style="list-style-type: none"> • 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), • analytical test methods to ensure compliance with LDR (if the waste is tested for LDR purposes), • sampling frequency (for repeating the initial analysis of 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). 	D	<p>Section C-3.2.2, <i>Land Disposal Restrictions</i>, satisfies the requirements of 40 §264.13(b)(6) and 40 CFR §268, as such Holloman AFB has fulfilled the regulatory requirements and it is not necessary to incorporate this table into its Permit Application.</p>	<p>D - NMED to discuss internally whether they still want to see this information presented in table format. NMED will communicate with HAFB more on this issue.</p>

Response to Comments (continued)

Comment #	Section/ Page	Paragraph/ Line	Comment	C, D, E ¹	Response	A or D ²
2. c.	Section C: Waste Analysis Plan		<p>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:</p> <ul style="list-style-type: none"> • 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	<p>Section C-4, <i>Sampling and Analysis Plan</i>, and other relevant portions of the revised WAP satisfy the regulatory requirements of 40 CFR §264.13(b)(3). The regulations do not require and the regulatory guidance does not recommend incorporation of more specific sample collection provisions into the permittee's Part B permit application.</p>	<p>D - NMED to discuss internally whether they still want to see this information presented in table format. NMED will communicate with HAFB more on this issue. HAFB will also add some generalized language on how it intends to satisfy the LDR requirements by using proper sampling techniques and equipment (this will be similar in content and level of detail to the text written in the SAP for waste characterization).</p>

Response to Comments (continued)

Comment #	Section/ Page	Paragraph/ Line	Comment	C, D, E ¹	Response	A or D ²
2. d.	Section C: Waste Analysis Plan		<p>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:</p> <ul style="list-style-type: none"> • documentation of the process-knowledge, • 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 data (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). 	D	Section C-3.2.2, <i>Land Disposal Restrictions</i> , satisfies the requirements of 40 §264.13(b)(6) and 40 CFR §268, as such Holloman AFB has fulfilled the regulatory requirements and additional information does not need to be incorporated into its Permit Application.	D - NMED to discuss internally whether they still want to see this information presented in table format. NMED will communicate with HAFB more on this issue.

Response to Comments (continued)

Comment #	Section/ Page	Paragraph/ Line	Comment	C, D, E ¹	Response	A or D ²
2. e.	Section C: Waste Analysis Plan		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).	D	Holloman AFB has fulfilled the regulatory requirements of 40 §264.13 in its revised WAP and additional information does not need to be incorporated into its Permit Application.	D - HAFB will incorporate example tracking documents for waste managed at the CSF as an attachment to the permit application. Qualifying language will be added to indicate that the documents are only examples, that they are subject to change, and that using documents different from those provided will not constitute an enforceable violation of permit conditions.

Response to Comments (continued)

Comment #	Section/ Page	Paragraph/ Line	Comment	C, D, E¹	Response	A or D²
2. f.	Section C: Waste Analysis Plan		Provide a sampling quality assurance/quality control (QA/QC) program and an example chain-of-custody form.	C	Section C-4.4, <i>Sampling QA/QC Procedures</i> , has been added to the WAP and incorporates sample documentation, equipment, handling and custody procedures. Holloman AFB has fulfilled the regulatory requirements of 40 CFR §264.13 in its revised WAP and it is not necessary to incorporate a sample chain-of-custody into its Permit Application. However, text was added to Section C-4.4.1, <i>Sample Handling and Chain of Custody</i> , as follows "The following information will be recorded when samples of waste are collected: the type of waste collected, including a brief description; the names and signatures of samplers; the sample number, and date and time of collection the names and signatures of any persons involved in transferring samples; and, if applicable, the shipping number, such as an airbill number, for samples shipped to off-site laboratories."	D - HAFB will incorporate an example COC under the same conditions stated above.
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.	D	The third paragraph of Section D-6, <i>Container Use and Management</i> , Page D-10, provides discussion on the storage and management of material released at the CSU. And, under the fourth bullet, page H-7 of Section H, <i>Contingency Plan</i> , it is stated in Holloman AFB's Permit Application that the CSU Environmental Coordinator will ensure that : all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed. The regulations do not require the submission of any additional information pertaining to post-emergency equipment maintenance.	A - NMED concurs with response.

Response to Comments (continued)

Comment #	Section/ Page	Paragraph/ Line	Comment	C, D, E¹	Response	A or D²
4.			Describe how the Containment Building leaks will be managed and repaired, and the certification following the repair of the building, to comply with the requirements specified by 40 CFR §264.1102.	D	Containment buildings are totally enclosed self-supporting structures with four walls, a roof and a floor, which are used to store or treat non-containerized wastes. 40 CFR §264.1102 is not applicable to the CSU at Holloman AFB. The typographical error in the regulatory citation on page D-1 will be corrected to 40 CFR 264.175. No further response or action is required for Request for Information Item 4, pg. 5 of 6.	A - NMED concurs with response.
5.	Section K-1: Closure Plan	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.	C	Section K-10, <i>Closure Schedule</i> , Page K-8, and Table K-1, <i>Schedule for Closure at the DRMO CSF</i> , provide information on the time allowed for closure. The following text has been added to the end of the paragraph to address the request for extension of closure time/activities beyond the regulatory 180 calendar days: "If Holloman AFB is unable to complete closure activities in accordance with the approved closure plan and within 180 days, as stipulated under the regulations, an extension will be requested from the New Mexico Environment Department in accordance with 40 CFR §264.113(b)."	A - NMED concurs with response.
6.			Please submit a discussion regarding the necessity for Emissions 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; procedures for documenting 4) exceedances; and 5) procedures for mitigating noncompliance.	C	Section D-7, <i>Air Emissions Management</i> , explains that the containers used at the CSU are DOT-approved Level 1 and Level 2 containers, as required by 40 CFR § 264.1086. Level 1 and Level 2 containers are not equipped with air emissions control devices. Nevertheless, the containers will be equipped with a cover and closure devices and each cover and closure device will only be open for the purpose of adding hazardous waste to the container or for collecting a sample for characterization, as required under the regulations. Thus, Holloman AFB is not required to establish an <i>Emissions Monitoring Plan</i> as specified under 40 CFR § 270.27(a).	A - NMED concurs with response.

Response to Comments (continued)

Comment #	Section/ Page	Paragraph/ Line	Comment	C, D, E ¹	Response	A or D ²
7.	Section H: Contingency Plan		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.	C	<p>The following text will be added to Section G-5 of the Permit Application: "Although Holloman AFB is the primary emergency responder for incidents that occur on base, provisions have been made for including off-base organizations in the response organization. In the event that on-base spill response resources and expertise are insufficient, or when off-base water, land, or air are adversely affected, off-base spill response resources can be incorporated into spill response team, as needed. Holloman AFB has a mutual aid agreement with several organizations to provide assistance in the event it should be needed. These organizations are listed below and discussed in Annex A, Appendix 5, Tab A of the <i>Holloman AFB Disaster Preparedness Readiness Plan 32-1</i>.</p> <ul style="list-style-type: none"> • City of Alamogordo Fire Department; • Village of Cloudcroft; • Alamo West Fire Rescue; and • White Sands Missile Range Emergency Control Center. <p>A copy of Plan 32-1 is distributed to each of these responders, as outlined in Annex Z, to familiarize response teams with the layout of the base, the properties of hazardous waste handled at the facility and associated hazards, work areas, entrances and roadways on base, and evacuation routes.</p>	A - NMED concurs with response.

Response to Comments (continued)

Comment #	Section/ Page	Paragraph/ Line	Comment	C, D, E¹	Response	A or D²
8.	Section H: Contingency Plan		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.]	C	Section H-6, <i>Emergency Procedures</i> , Page H-6, presents a detailed discussion of the emergency response procedures Holloman AFB will implement in the event of an emergency. Hazardous waste identification is presented in bullet #2, Page H-6, in accordance with 40 CFR §264.56(b). Hazard assessment is presented in bullet #3, Page H-6, in accordance with 40 CFR §264.56(c). Control procedures are presented in bullets # 1-4, Page H-7, in accordance with 40 CFR §264.56(e), (f), (g), and (h). Holloman AFB has fulfilled the regulatory requirements of 40 CFR §264.56 in Section H-6 of the Permit Application.	A - NMED concurs with response.
9.	Section F: Inspection Strategy	Table F-1	Add to Table F-1 the inspection requirements and inspection frequency for run-on and run-off of rainwater at the CSU.	D	The NMED concerns about inspection frequency for run-on and run-off of rainwater at the CSU are satisfied by the terms of Holloman AFB's NPDES Stormwater Discharge Permit. The permit requires inspection of outfall #2, associated with the DRMO facility, during rainfall events. Quarterly stormwater inspections, which include a visual inspection of the indoor and covered outdoor hazardous waste storage areas of the CSU, are performed. The Clean Water Act (CWA) and RCRA regulations are designed to provided protection to the public health and the environment without overlapping levels of regulatory oversight for the same issues and factors.	A - NMED concurs with response.