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HAFB
2000

State of New Mexico
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Hazardous & Radioactive Materials Bureau
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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

January 19, 2000

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

**SUBJECT: CONTAINER STORAGE UNIT: NOTICE OF DEFICIENCY (NOD)
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 completeness the Holloman Air Force Base (HAFB) response to HRMB's Request for Supplemental Information (RSI) on the Permit Application for the Container Storage Unit. The response to the RSI was dated June 1, 1999.

Pursuant to its authority under the New Mexico Hazardous Waste Act, N.M.S.A. 74-4-1 *et seq.*, and the New Mexico Hazardous Waste Management Regulations, 20 NMAC 4.1, HRMB has found the response to the RSI to be technically incomplete. HRMB has determined that the Waste Analysis Plan contained in the Permit Application must include specific waste analysis information to ensure that each waste stream is managed in accordance with the Land Disposal Restriction (LDR) treatment standards specified in 40 CFR §268. HRMB is requiring this information in accordance with 20 NMAC 4.1.500 and .900 [incorporating 40 CFR §264.13 and §270.32(b)(2)]. According to 40 CFR §264.13(b), the waste analysis plan must contain, at a minimum, the information specified in (b)(1) through (b)(4) and (b)(6). The regulations in 40 CFR §270.32(b)(2), otherwise known as the "omnibus authority" gives HRMB the right to require in the operating permit "terms and conditions as the Director determines necessary to protect human health and the environment."

The enclosed list identifies the deficiencies that HAFB must address, incorporate into Section C (*Waste Analysis Plan*), and submit to the HRMB for evaluation and final determination.

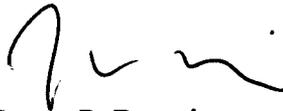
Mr. Moffitt, HAFB
Page 2 of 2
January 19, 2000

HAFB shall submit the required information within sixty (60) calendar days from the date you receive this letter and the attached NOD. Please present the required information in two hard copies and an electronic copy on a 3.5" diskette compatible with MS Word, or Word Perfect for Windows 5.2/6.1. Failure to provide the required information within the designated time period may result in HRMB issuing HAFB a notice of intent to deny (**NOID**) the Container Storage Permit renewal/issuance.

HRMB may consider a petition for a deadline extension, provided that a written justification and the expected submittal time are given.

If you have any questions please call Cornelius Amindyas at (505) 827-1561 x 1030 or Kirby Olson at (505) 827-1561 x 1034.

Sincerely,



James P. Bearzi,
Chief
Hazardous and Radioactive Materials Bureau

Enclosure

cc: John E. Kieling, Acting Manager, RCRA Permits Management Program
Robert S. (Stu) Dinwiddie, RCRA Adviser, HRMB
Kirby Olson, Environmental Specialist, HRMB
Cornelius Amindyas, Environmental Specialist, HRMB
David Neleigh, Chief, EPA Region VI (6PD-N)
Allen Chang, EPA Region VI (6PD-N)

FILE: Red, HAFB 99
TRACK: HAFB, 01/19/00, HAFB, HRMB/CA, NOD on Permit Application.

NOTICE OF DEFICIENCY:
HAFB CONTAINER STORAGE PERMIT RENEWAL APPLICATION
January 19, 2000

After reviewing Holloman Air Force Base's (HAFB's) response to the Request for Supplemental Information (RSI) on the Permit renewal application dated July 1997, and the June 1, 1999 Response to the RSI, the Hazardous and Radioactive Materials Bureau (HRMB) found the response to the RSI to be technically incomplete. The following list contains the deficiencies that HAFB must address and submit to HRMB for a determination on the technical completeness of the Permit Application.

Note: HAFB has not submitted the information required in the items numbered 1 through 5, although assurances about the Facility's plan to present the required information were given in response to the RSI dated June 1, 1999. Further, HAFB must present the required information in a form that can be incorporated into the respective sections of the Permit Application.

The quotations in **bold** are taken directly from the Permit Application text, and Section C of response to the RSI (that contained **highlighted** and **deleted** paragraphs).

1) Section B-3, Page B-5, and Page B-6, Figure B-3: "Topographic Map" and "Figure B-3":

The topographic map (scale, 1:62,500) incorporated into Part A Permit Application does not satisfy the requirements of New Mexico Hazardous Waste Management Regulations. Figure B-3, which was supposed to be a topographic map with contour lines, also does not satisfy the requirements of New Mexico Hazardous Waste Management Regulations. The purpose of the topographic map is to depict surface water drainage patterns. Therefore HAFB must submit a topographic map which:

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

2) 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. Discuss the equipment maintenance at the CSU following emergencies.

3) Permit Application, "Section K-1 Closure Plan": Time allowed for Closure:

Provide information on the time allowed for closure, and HAFB's plans to request an extension of closure time/activities beyond the regulatory 180 calendar days specified in 20 NMAC 4.1.500 (incorporating 40 CFR §264.113). Provide the information that HAFB had

indicated (in the June 1, 1999 response to item # 5 of HRMB's RSI) would be added to page K-8 of the Closure Plan in the Permit Application.

4) Permit Application "**Section H: Contingency Plan**":

Provide information on arrangements with local authorities (e.g., the City of Alamogordo Fire Department, Police, etc.) for potential needs of other organizations during emergencies at and around HAFB, as specified by 20 NMAC 4.1.500 (incorporating 40 CFR §264.37). (The information contained in HAFB's response to HRMB's RSI may be added in the remaining space on page H-8 of the 1997 Permit Application, and submitted for incorporation into the Permit Application).

5) Provide a detailed discussion on emergency response procedures, identification of hazardous waste, hazard assessment, and control procedures. This information is in the current operating Permit but is missing from the Permit renewal Application.

6) Page C-6, Sections C-3.1.1 through C-3.1.5: "**C-3.1.1. - Paint Related Material Waste**" ..., **C-3.1.5. - Photocopying Operations**".

- Provide the average amount/volume of each waste type accepted from the generating stations on HAFB for storage, the average size of a representative hazardous waste sample, a typical liquid sample size, and the total number of samples tested each year, as specified by 20 NMAC 4.1.500 (incorporating 40 CFR §264.13(a)(1-2) and (3)(i)).
- Describe the method that will be used to obtain representative hazardous waste samples for analysis, as specified by 20 NMAC 4.1.500 (incorporating 40 CFR §264.13(b)(3)).
- Describe the frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is up to date and accurate, as specified by 20 NMAC 4.4.500 (incorporating 40 CFR §264.13(b)(4)).
- Explain how the waste is tracked from the time it is generated to the time it leaves the permitted Container 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, in a manner protective of human health and the environment, as specified by 20 NMAC 4.1.900 (incorporating 40 CFR §270(32)(b)(2)). Provide examples of the waste tracking documents (e.g., waste profile forms, container labels, bar codes), as agreed to at the HRMB/HAFB meeting of June 4, 1999.

- 7) Page C-7, Section 3-3.3, First paragraph, third sentence, "**Aircraft, Vehicle, and Equipment Maintenance Waste:**"

"VOCs and SVOCs are also typical components of fuels and lubricants and should be tested for in uncharacterized waste streams associated with fuel or lubricant use."

Describe how the uncharacterized hazardous waste mentioned above will be sampled, and the frequency with which each waste stream will be sampled as specified by 40 CFR §264.13(b) and §270.32(b)(2):

- 8) Page C-16, Table C-1, **Column 1**, "Waste Category".

Provide the following information for each of the Waste Categories/Waste Streams listed in column 1, as specified by 40 CFR §264.13(b) and §270.32(b)(2):

- 1) Processes Generating Each Waste Category , and
- 2) Locations at which the waste is generated,

Example, under "**Paint-Related Material**" in **Column 1**:

Process Generating the Waste, e.g., Airplane Painting, Corrosion Control, Vehicle Painting, Electroplating;

Locations: Jet engine Shop, Civil Engineering Paint Shop, Auto Hobby Shop, etc.

- 9) Page C-16, Table C-1, **Column 2**, "Waste Type":

Re-organize Column 2 of Table C-1 to contain both the waste type and the characteristic under it, as specified by 20 NMAC 4.1.500 and .900 (incorporating 40 CFR §264.13(b) and §270.32(b)(2)). For example:

WASTE TYPE AND ITS CHARACTERISTICS	BASIS FOR HAZARD CLASSIFICATION	PARAMETERS FOR ANALYSIS AND WASTE CODES
Waste Paint and Thinner: <u>Pb, Cr, Cd, Se - Toxic Solvents - Ignitable, etc.</u>	Process Knowledge, Analysis, etc.	Cadmium (D006), Lead (D008), VOCs, and SVOCs, etc.

- 10) Since the WAP does not identify the specific waste streams that will be characterized based on process knowledge, HAFB must provide an extra column in Table C-1 indicating the *Basis for Hazard Classification* as shown in the Table under item # 9 above (i.e., process knowledge, analysis, or both).
- 11) Provide an additional column to Table C-1, indicating whether or not the bulk contaminant concentration of each waste stream Exceeds or Doesn't Exceed LDR Standards.
- 12) Page B-10, Figure B-6, "**Layout of Container Storage Facility**":

Submit information on how much waste is stored at the "**indoor covered container storage building**", and also how much waste is stored at the "**outdoor container storage area**" illustrated in Figure B-6.