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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 30, 2008

Ms. Debbie Hartell
Chief
Environmental Flight
49 CES/CEV
550 Tabosa Ave.
Holloman AFB, NM 88330-8458

**SUBJECT: NOTICE OF DEFICIENCY # 2
OPEN DETONATION PERMIT RENEWAL APPLICATION
HOLLOMAN AIR FORCE BASE NM6572124422
HWB-HAFB-06-004**

Dear Ms. Hartell:

The New Mexico Environment Department (NMED) has reviewed the Holloman Air Force Base (HAFB, the Permittee) July 7, 2008 response to the Notice of Deficiency (NOD) on its 20,000-pound Open Detonation (OD) Treatment Unit Permit renewal application. NMED finds the response to the NOD administratively and technically incomplete. This NOD lists the issues the Permittee must address, and the additional information that must be submitted to NMED before it can make a determination on the administrative completeness of the Permit renewal application.

ADMINISTRATIVE AND TECHNICAL COMMENTS

The quotations **in bold** are taken directly from the Permit Renewal Application. In your response to this NOD, please highlight information added, and ~~strikeout~~ where information has been replaced.

A. GENERAL DESCRIPTION

1. **List of Acronyms:** Provide a list of the all acronyms used in the revised Permit renewal application and add the list at the end of the Table of Contents. [The subject list was not provided in the original Permit renewal application].
2. **Attachment A, Section A.4, Page 8 of 19, Topographic Maps:**
 - a. Provide a revised Map A-5 on which the OD Unit is written on the map, rather than just showing it in the legend. Also indicate the names of the intermittent streams on the same map. The streams at HAFB are mentioned in the body of the application but are not always illustrated on the maps.
 - b. Provide a stand-alone site location map of Holloman Air Force Base showing all the solid waste management units (SWMUs) and areas of concern (AOCs) that require further corrective action. Include all the sites undergoing corrective action. HAFB may consider revising and submitting Figure 1-1 on page 1-4 of the Permittee's September 1997 document, "Phase I RCRA Facility Investigation Report, Table 2 Solid Waste Management Units, Volume I".

B. WASTE ANALYSIS PLAN FOR WASTES TREATED AT THE OD UNIT

3. **Attachment B, Page 20 of 54, Table B-5, last Column:** Provide the total amount of waste detonated, which includes the net explosive weight (NEW), the casings, associated contaminant devices, and detonating charges disposed of with the net explosives weight. This will help the public know the whole amount of waste treated at the OD Unit; even though the Permittee asserts that it recycles the casings (e.g., lead casings). Provide an estimated amount, in pounds, of the post-detonation fragments and unexploded ordnance (UXO) that the Permittee recycles.

C. INSPECTION SCHEDULE

4. Attachment C, Page 2 of 3, Section C.1.4, First sentence, "**A log will be kept to record inspection findings at the OD Unit as specified in Technical Orders 11A-142...**"

The Permittee did not address the above sentence in its response to the first NOD.

Please provide the relevant information that the Permittee will be using, from the referenced Technical Orders 11A-142 ["A description of General Instructions for Disposal of Conventional Munitions"] in conducting inspection of hazardous waste. Incorporate excerpts of that document into a revised and more comprehensive Section C.1.4 of the permit renewal application, providing details of the inspection *modus*

operandum.

D. CONTINGENCY PLAN

5. Attachment F, Page 1 of 18, Section **F.1.1, Loading/Unloading Operations**, Second paragraph: **“The Explosives Safety Standards, AFMAN 91-201, will be followed for all loading and unloading operations.”**

Provide a detailed description of the methods of loading and unloading the reactive wastes contained in Technical Orders 11A-1-42 and 11A-1-60, and AFMAN 91-201. NMED shall incorporate this information into the draft Permit, using both the application and other regulatory documents. This will assist third party readers of the application and subsequent draft Permit during review of the documents subjected to public review, rather than citing the given references. Additionally, Sections E.2.4.6 and 2.4.9 of the same documents were referenced in response to Comment # 30 of the first NOD. The Permittee should address those comments more fully in the respective sections.

6. Pursuant to 40 C.F.R. § 264.17, submit information from AFMAN 91-201[“*Explosive Safety standards*”], and TO 11A-1-42 [“*General Instructions for the Disposal of Conventional Munitions*”], Section 1 that describes the standard operating procedures for the 20,000 pound open detonation treatment events.
7. a. Describe the safety procedures that will be followed by the Emergency Coordinator to prevent fires, explosions, or unplanned hazardous/explosive waste releases from occurring, or spreading to other hazardous waste management areas at Holloman Air Force Base.
- b. Explain why the use of cell phones was not mentioned as a prohibition during explosive ordnance disposal operations, to prevent static at the OD Unit.

8. Provide Exhibit F-3, which was mentioned in response to Comment 40 of the first NOD.

E. HEALTH AND SAFETY PLAN

9. Attachment F, Section **F.1.11 “Health and Safety Plan”**: Provide a Health and Safety Plan that covers personnel protection procedures, as required by the Hazardous Waste Management Regulations, 20.4.900 incorporating 40 CFR § 270.14(b)(8)(v). The Permittee asserts that the required information can be found in the document titled “AFMAN 91-201[Explosive Safety standards], and TO 11A-1-42, and HAFBEODOI 32-3001-05.” Please provide excerpts of the health and safety procedures from the cited documents, and add that information to Section F.1.11 of the Permit renewal application.

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F. CLOSURE SAMPLING

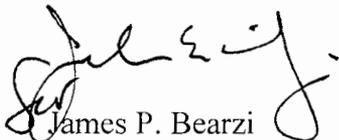
10. Attachment G, Page 5 of 12, Section **G.4.4, Closure Sampling**, 3rd paragraph, **“A 200-foot by 200-foot area centered on the depression caused by the most recent detonation event will be divided into grids for sampling ...”**

Provide a scaled diagram of the 20,000-pound OD Unit showing the proposed closure soil sampling locations for unsaturated zone monitoring that are described in Section G.4.4 of the revised permit renewal application that the Permittee submitted in response to the first NMED notice of deficiency dated July 18, 2007. Indicate also the locations from which background soil samples will be taken, as described in Section 4.5 in Attachment G of the revised Permit renewal application. These should be from areas that are unaffected by open detonation treatment activities.

The Permittee must submit the requested information by March 1, 2009.

If you have any questions on the attached NOD please contact Cornelius Amindyas of my staff at (505) 222-9543 or at the above letterhead address.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

cc: J. Kieling, HWB NMED
C. Amindyas, HWB NMED
L. King, EPA Region VI (6PD-N)
File: HAFB 2007 and Reading
HAFB-06-004