DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 49TH WING (ACC)
HOLLOMAN AIR FORCE BASE, NEW MEXICO

ENTERED

NOV 1 8 2010

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NMED-Hazardous Waste Bureau
Attn: James Bearzi
2905 Rodeo Park Drive East, Bldg 1.
Santa Fe, New Mexico 87505-6303

Dear Mr. Bearzi

Enclosed is the information requested, per phone conversation with Mr. Cornelius Amindyas, on 21 Aug 2010, regarding the Defense Reutilization and Marketing Office (DRMO) name change to the Defense Logistics Agency Disposition Services (DLADS). All occurrences of DRMO in the permit have been changed to DLADS, as requested.

If you have any questions or require additional information, please contact Ms. Geraldine Arellano of the 49th Civil Engineer Squadron Asset Management Flight at (575) 572-3931.

A. DAVID BUDAK
Deputy Base Civil Engineer

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cc:
Mr. Cornelius Amindyas
Hazardous Waste Bureau
5500 San Antonio Dr. NE
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Table of Contents

LIST OF ACRONYMS

AK	Acceptable Knowledge
AOC	Area of Concern
AMU	Atomic Mass Unit
ASTM	American Society for Testing and Materials
BGS	Below Ground Surface
CAMU	Corrective Action Management Unit
CEC	Cation Exchange Capacity
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CES	Civil Engineering Squadron
CFR	Code of Federal Regulations
CMS	Corrective Measure Study
COC	Chain of Custody
CSU	Container Storage Unit
DLADS	Defense Logistics Agency Disposition Services
DOT	U.S. Department of Transportation
DQO	Data Quality Objectives
DRMO	Defense Reutilization and Marketing Office
EC	Emergency Coordinator
EPA	U.S. Environmental Protection Agency
GC/MS	Gas Chromatography/Mass Spectrometry
HAFB	Holloman Air Force Base
HWA	New Mexico Hazardous Waste Act
HWB	Hazardous Waste Bureau
KOP	Knowledge of Process
LDR	Land Disposal Restrictions
MOU	Memorandum of Understanding
MSDS	Material Safety Data Sheet
MS/MSD	Matrix Spike/Matrix Spike Duplicate
NFA	No Further Action
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
PARCC	Precision, Accuracy, Representativeness, Completeness, and Comparability
PCBs	Polychlorinated Biphenyls
PID	Photo-ionization Detector
PPE	Personal Protective Equipment
QA/QC	Quality Assurance/Quality Control
QAPP	Quality Assurance Project Plans
RCRA	Resource Conservation and Recovery Act
RFA	RCRA Facility Assessment

LIST OF ACRONYMS (Continued)

Appendix 4-A

60	Building 844 Waste Accumulation Area	EPA listed the site in 1988 as a SWMU with no further corrective action required.
61	Building 851 Waste Accumulation Area	EPA listed the site in 1988 as a SWMU with no further corrective action required.
62	Building 855 Waste Accumulation Area	EPA listed the site in 1988 as a SWMU with no further corrective action required.
63	Building 867 Waste Accumulation Area	EPA listed the site in 1988 as a SWMU with no further corrective action required.
64	Building 869 Waste Accumulation Area	EPA listed the site in 1988 as a SWMU with no further corrective action required.
65	Building 901 Waste Accumulation Area	EPA listed the site in 1988 as a SWMU with no further corrective action required.
66	Building 901 Waste Accumulation Area	EPA listed the site in 1988 as a SWMU with no further corrective action required.
67	Building 909 Waste Accumulation Area	EPA listed the site in 1988 as a SWMU with no further corrective action required.
68	Building 910 Waste Accumulation Area	EPA listed the site in 1988 as a SWMU with no further corrective action required.
69	Building 807 Waste Accumulation Area	EPA listed the site in 1988 as a SWMU with no further corrective action required.
70	Building 1119 Waste Accumulation Area	EPA listed the site in 1988 as a SWMU with no further corrective action required.
71	Building 1778A Waste Accumulation Area	EPA listed the site in 1988 as a SWMU with no further corrective action required.
72	Building 1178A Waste Accumulation Area	EPA listed the site in 1988 as a SWMU with no further corrective action required.
73	Building 1266 Waste Accumulation Area	EPA listed the site in 1988 as a SWMU with no further corrective action required.
74	Building 7005 Waste Accumulation Area	EPA listed the site in 1988 as a SWMU with no further corrective action required.
76	DLADS Non-Hazardous Waste Drain	EPA listed the site in 1988 as a SWMU with no further corrective action required.
77	RATSCAT Waste Accumulation Area	EPA listed the site in 1988 as a SWMU with no further corrective action required.
78	Trim Pad 3 WAA	EPA listed the site in 1988 as

147	Splitter Box	NFAd in February 2001
148	Sewage Lagoon A	Closed June 30, 2000
149	Sewage Lagoon B	Closed June 30, 2000
150	Sewage Lagoon C	Closed June 30, 2000
151	Sewage Lagoon D	Closed June 30, 2000
152	Sewage Lagoon E	Closed June 30, 2000
153	Sewage Lagoon F	Closed June 30, 2000
154	Sewage Lagoon G	Closed June 30, 2000
155	Sludge Drying Beds	NFAd in February 2001
156	Imhoff Tanks (5)	NFAd in February 2001
157	ABLE 51 PCB Storage Area	NFAd in February 2001
158	PCB Storage Bunker	NFAd in February 2001
159	Building 500 Pb Storage Shelves	NFAd in February 2001
160	Building 500 NiCd Battery Storage Area	NFAd in February 2001
161	Building 844 Battery Storage Area	NFAd in February 2001
162	DLADS Scrap Metal Storage Area	EPA called this site a SWMU in 1988, but did not require correctiveaction[1].
163	DLADS Wood Pile	EPA called this site a SWMU in 1988, but did not require correctiveaction[1].
164	Building 1080 Pond	NFAd in February 2001.
165	Building 1176 Pond	NFAd in February 2001.
167	Test Shed Launch Area Collection Basin	EPA identified it in 1988 as a SWMU without requiring further corrective action
169	Burn Kettle	EPA identified it in 1988 as a SWMU without requiring further corrective action
171	Fire Department Training Area 2	NFAd in February 2001
173	Building 198 Sand Trap	EPA listed this as a SWMU in the 1988 RFA Report
174	Building 231 Hobby Shop Silver Recovery Unit	EPA listed this as a SWMU in the 1988 RFA Report
176	Building 844 Sand Trap	EPA listed this as a SWMU in the 1988 RFA Report
178	Building 1191 Fuel Runoff Pits	NFAd in February 2001
180	Building 301 Outdoor Drainage Flume	NFAd in February 2001
182	Building Floor Drains	NFAd in February 2001
184	Wastewater Re-circulation Line	NFAd in February 2001
185	Building 332 Silver Recovery Unit	EPA identified this site as a SWMU in 1988.
186	Hospital Silver Recovery Unit	EPA identified this site as a SWMU in 1988.

Attachment B

ACC readiness requirements and Base activities necessitate the use of a variety of products to maintain and repair aircraft and aerospace ground equipment (**AGE**) as well as Base structures and roads. These items become wastes because of contamination during use, exceedance of shelf life, unanticipated deterioration, or failure to meet specifications that renders the material non-usable. Many of these wastes are also hazardous waste under the Resource Conservation and Recovery Act (**RCRA**) because they either exhibit a characteristic of ignitability, corrosivity, reactivity, or toxicity; or they meet the definition of listed waste under 40 CFR Part 261 Subpart D.

These on-site generated wastes are initially managed at waste accumulation points in accordance with the requirements specified in 20 NMAC 4.1.300 incorporating 40 CFR §262.34 and are located in the work areas where they are first generated. To facilitate disposal, most hazardous wastes are transferred by the individual producers of the wastes to the CSU operated by the Defense Logistics Agency Disposition Services (**DLADS**), which is located on Base in Building 118. The objectives of the DLADS are to market and re-sell items that are reusable or have market value and to manage the contracts for the disposal of hazardous and solid wastes that have limited or no opportunities for reuse or resale.

Container Storage (CSU) Location Information

The CSU is located on the east side of the Base, approximately 1,400 feet (**ft**) inside the eastern boundary of the Base. The street address is 241 Arkansas Avenue, Holloman AFB, and New Mexico 88330. The CSU is located on approximately 400,000 ft^2 of land designated for use by DLADS as shown in Figure B-3.

Seismic Standards

The CSU is located in Otero County, which is not among the political jurisdictions designated in 40 CFR §264 Appendix VI for seismic considerations; therefore, the CSU is exempt from seismic considerations.

Flood Plain Standards

The CSU is not located within the 100-year or 500-year flood plains of intermittent streams in the area. Additional information related to surface drainage patterns is provided in the next paragraph.

Topographic Map

A map showing the CSU and the surrounding area is presented in Figure B-3. The contour lines on Figure B-3 indicate that the facility is located on relatively flat terrain. The facility is also located above the 100-year flood plain boundaries. No permanent surface water of constant flow conditions is located in the area.

The map (Figure B-3) shows the CSU and surrounding land on a scale of one inch equal to 200 ft. The map also shows a distance of 1,000 ft around the CSU at a scale of 2.5 centimeters (1 inch) equal to 61.0 meters (200 ft) and shows the following, as specified by 40 CFR 270.14(b)(19):

- Map scale and date;
- Orientation of map;
- Unit boundaries; and
- Distance to nearest residential buildings, public roadways, and passenger railroad.

Surrounding Land Uses

The CSU is located within the boundaries of Holloman AFB. All lands within Holloman AFB boundaries are under the control of the U.S. Air Force. Thus, the CSU is surrounded by access-controlled federal lands for a distance of several miles in all directions. Figure B-4 shows the land use surrounding the CSU. Figure B-5 is an aerial photo that shows the distance to the nearest building and residence.

The area immediately surrounding the CSU is designated as industrial land use. No residential areas are located adjacent to the CSU. The nearest military housing is located at least 500 ft from the Container Storage Unit.

Unit Boundaries

Boundaries of the CSU and the location of operational units within the CSU (including equipment) are shown in Figure B-6.

Wind Rose

Wind roses for the last five years are provided as *Appendix B-1* to this Attachment. The wind roses show prevailing wind speed and direction.

Access Control

Access control to the CSU is provided by a six-foot high chain-link fence surrounding the defense logistics agency deposition services **(DLADS)** complex. The fence is equipped with locking gates, and access is strictly controlled by DLADS personnel. The CSU can only be accessed by Base personnel during DLADS hours of operation or in an emergency. Holloman AFB personnel turning in waste to the CSU are usually accompanied by DLADS and/or 49 Civil Engineer Squadron/Environmental Flight (**CES/CEV**) personnel while in the CSU area. Permit Attachment E presents additional details on CSU security procedures and equipment.

Injection and Withdrawal Wells

No injection or withdrawal wells are located within the CSU's boundary or the adjacent area. The location of groundwater wells within the boundaries of Holloman AFB and the location of wells in the areas adjacent to the Base boundaries are discussed in Permit Attachment C, under the subtitle *A, Protection of Groundwater.*

STRUCTURES

Buildings

Buildings immediately surrounding the CSU are industrial shops. The nearest buildings are the DLADS Administration buildings located approximately 320 ft northwest of the CSU. Military housing units are located more than 500 ft from the CSU.

Recreation Areas

No recreation areas are located in the vicinity of the CSU.

Run-off Control Systems

The procedures for run-off control systems are addressed in Table C-1 of Permit Attachment C, under *Drainage, Run-on, and Run-off Controls*, for the staging area, covered outdoor storage area, and indoor storage building.

Container Storage Facility Access and Internal Roads

The CSU can be accessed from Arkansas Avenue through a gate on the northeast side of the CSU, which remains locked except during DLADS operating hours. From the road, vehicles entering the CSU turn onto a flat paved asphalt area. From the paved area, vehicles have access to the cement ramp leading to the staging area.

Storm, Sanitary, and Process Sewer Systems

The CSU does not discharge to a storm sewer, sanitary sewer, or process sewer.

Loading and Unloading Areas

In order to load or unload hazardous waste from the CSU, vehicles back onto the concrete ramp that enters the staging area. Vehicles back into the staging area only far enough to ensure that any spills that could occur during loading or unloading of waste would be contained in the staging area. Vehicles do not typically drive completely into the staging area because of limited space in the staging area.

Fire Control Facilities and Equipment

Detailed information on fire control facilities and equipment is included in Permit Attachment G, *Preparedness and Prevention Requirements*.

Surface Waters

Surface water flows in the vicinity of Holloman AFB are generally intermittent in nature. Permit Attachment B, *Figure B-3: Topographic Map* shows the surface water features in the area.

Flood Control

The Container Storage Unit is elevated sufficiently above the flood plain levels, making the potential for flooding virtually nonexistent. Figure B-7 is a flood plain map of the Container Storage Unit and its vicinity.

TRAFFIC INFORMATION

Traffic Patterns

Access to the CSU is provided by a paved asphalt entry that leads to the staging area ramp. Access to the paved asphalt area is provided by a paved Base road, Arkansas Avenue. Traffic along Arkansas Avenue is limited to Holloman AFB personnel and authorized visitors. Access to the CSU is controlled by a gate that is locked except during DLADS operating hours.

Access Road Surface

The road leading to the CSU entrance is a paved surface. This surface is periodically maintained to prevent the formation of holes, ditches, or other deformations that would increase the possibility that containers holding hazardous waste en route to or from the CSU could rupture or spill.

Load Bearing Capacity

The paved road and the paved asphalt area were graded and compacted to provide capacity for automobiles, light trucks, and service vehicles. The maximum amount of waste per vehicle that is moved along the paved road and asphalt area within the fence line of the CSU is approximately ten 55-gallon drums or 550 gallons.

Attachment C

PERMIT ATTACHMENT C
DESIGN AND OPERATION OF THE CONTAINER STORAGE UNIT

Detailed Design Description of the Container Storage Unit

The Container Storage Unit **(CSU)** operated by the Defense Logistics Agency Disposition Services **(DLADS)** is used for the management and storage of hazardous waste generated at HAFB (i.e., **on-site)** in containers. No tanks, waste piles, surface impoundments, incinerators, landfills, land treatment units, or miscellaneous units are managed by or used at this CSU; thus the Unit is exempt from Construction Quality Assurance Program requirements outlined in 20.4.1.500 NMAC, incorporating 40 CFR §264.19. However, this description is provided to demonstrate compliance with 20.4.1.500 NMAC, incorporating 40 CFR §264.175. The purpose of the CSU is to temporarily manage and store hazardous waste generated at Holloman AFB to allow enough time for DLADS personnel to arrange for approved contractors to accept, transport, treat, and dispose of the hazardous waste cost effectively.

Holloman AFB does not treat or dispose of hazardous waste at the CSU. No wastes are accepted from any entity not located at Holloman AFB (i.e., **off-site**). The majority of the on-site wastes accepted by DLADS are contained in 55-gallon containers. Occasionally, wastes are contained in larger containers such as 85-gallon salvage drums or self-contained packaging including lead-acid batteries or transformers.

Design of the CSU

The CSU comprises a staging area, a covered outdoor storage area, and a building that provides indoor storage capacity for wastes. The staging area, a concrete pad, is used for the initial receipt of waste from other locations at Holloman AFB. The building and covered outdoors storage area is used to temporarily store waste until an approved waste transportation contractor picks it up. The site plan layout and a floor plan are provided in Permit Attachment B, Figure B-6. Table C-1 of this Attachment provides the construction specifications for each part of the CSU.

Containment System

The containment system for each of the container storage areas (i.e., the staging area, outdoor storage area, and indoor storage building) was described in detail in Table C-1, *Container Storage Facility Construction Specifications*.

Protection from Precipitation and Run-on Controls.

The maximum precipitation received at HAFB, including the CSU area during a 24-hour, 44-year storm event equals 2.1 inches. Since the average annual evaporation rate in the area is approximately 70 inches and the average annual rainfall is approximately 11 inches, generally there is no problem with accumulation of precipitation in any part of the CSU.

Much of the hazardous waste shall be stored in the indoor container storage building. The enclosed nature of this building prevents entry of precipitation or run-on. Additionally, precipitation and run-on are prevented from entering the structure by the curb on which the building rests. A 2 ft to 3 ft wide clear zone that slopes away from the building provides additional protection from run-on.

The sloped clear zone that surrounds the indoor container storage building extends to surround the staging area and directs run-off away from the staging area. Precipitation in the staging area collects in the sump and can be vacuumed or pumped out. It is highly unlikely that an accumulation of precipitation combined with a spillage of waste would occur simultaneously. Also, based on precipitation data, it is highly improbable that the containment capacity in the staging area would ever be inundated to the point that precipitation would run off to the surrounding area. The primary provisions for exclusion of precipitation or run-on from the current outdoor storage area are the 6-inch high curbs that encircle it and the sloped 2 ft to 3 ft clear zone that surrounds the area to direct run-off away from the pad.

Management of Accumulated Liquids.

Accumulated liquids other than precipitation in the containment area in the outdoor covered storage building or the sump in the staging area shall be managed in a manner that is protective of human health and the environment. Accumulated liquids are considered to result from spillage until proven otherwise. Thus, upon discovery, DLADS personnel will notify the Holloman AFB Fire Department. The Fire Department then has the primary responsibility to remove, clean up, and/or manage any liquid spills that are toxic or assumed to be toxic. The Fire Department will work with the Spill Response Team if necessary.

Operating Hours

The DLADS maintains regular operating hours. During operating hours DLADS personnel are available to receive hazardous waste from less than 90-day accumulation sites and initial/satellite accumulation points located on Holloman AFB.

OPERATING PROCEDURES

Initial Waste Receipt and Confirmation

When containerized hazardous and nonhazardous waste is received from Base accumulation areas, including less than 90-day accumulation sites and initial/satellite accumulation points, the containers hall be placed in the staging area to facilitate inspection of the containers. DLADS personnel shall verify that the turn-in documentation and labeling information (e.g., proper shipping name, warning labels) is accurate. If the information on the container label does not match the information on the turn-in documents or if the container is not in good condition (e.g., rusted, dented), DLADS personnel shall refuse to accept the waste until the problem is corrected by Holloman AFB CEV and/or the generating activity.

Waste Staging

All wastes shall be placed on pallets in the staging area. Incompatible wastes shall be kept segregated to ensure that they cannot mix in the event of a leak or accidental spill.

Loading and Unloading

Vehicles do not enter the staging area beyond the ramp. Forklifts shall be used to transfer waste from the vehicles to the staging area.

Only Department of Transportation (**DOT**) approved containers in good condition shall be used for waste management and storage. This operating practice coupled with pre-storage inspections ensures that the waste is held in the appropriate DOT container and that the container is free of dents, creases, bulges, evidence of spillage, or corrosion. These practices reduce the possibility of handling spillage caused by a weakened container.

During staging operations, storage containers shall be kept free of standing liquids. This requirement shall be met by the use of pallets and drum racks. For some containers stored in the outdoor storage area, drumhead covers shall be used to prevent accumulation of moisture on the drum. Staging operations shall not be conducted if precipitation is occurring. If containers are stacked during transfer or storage, they shall be tied down to prevent spills and leaks.

Transfer operations (loading and unloading) are typically permitted only during posted operating hours. Pre-handling inspections shall be conducted to ensure the absence of standing liquids and unauthorized personnel or equipment.

Prevention of Ignition

Prevention of ignition is accomplished during storage by exclusion of open flames, smoking, or maintenance activities during handling of waste. Forklifts shall be the only mobile equipment that operate during handling. Transport vehicles shall be turned off prior to any container entering the staging area and shall remain off until all containers are transferred into the storage building or are loaded on the off-site transport vehicle. Utilities are limited to the fire alarm and explosion-proof lighting system.

Placement of Wastes in Storage

After DLADS staff have confirmed that wastes are compatible with their containers, containers are properly labeled and in good condition, and that the turn-in documentation matches the container(s) of waste, the wastes shall be placed in either an appropriate indoor storage cell that contains other compatible wastes or in the outdoor storage area in an appropriate container rack.

Container Compatibility

To ensure that all containers are compatible with the contained waste, all wastes shall be placed in containers that meet performance-oriented packaging standards as specified by the DOT Hazardous Materials Table (**HMT**) in 49 CFR §172.101. If the CSU receives waste that is contained in its original packaging and that packaging is in good condition, the waste does not require repackaging. The HMT provides container labeling requirements, shipping requirements, and container specifications for all types of waste. By following the DOT requirements for container selection, personnel can ensure that all containers are compatible with the waste they contain. The wastes shall be packaged in DOT-approved containers before they arrive at the CSU. Incompatible wastes shall never be placed in the same container.

If a container leaks and must be over-packed or transferred to a new container, the salvage drums and containers into which the waste will be placed must not have previously held any waste. DLADS personnel will ensure that these containers and salvage drums are compatible with the leaking or spill wastes and any absorbent material.

MANAGEMENT OF IGNITABLE, REACTIVE, AND INCOMPATIBLE WASTE

Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Waste

Both design standards and operating practices are relied upon to prevent accidental ignition of wastes. As previously indicated, the utilities of the CSU are restricted to interior lighting and fire alarms. These items are designed and installed to be of non-sparking nature. Forklifts that operate at the CSU are designed to operate in potential fire hazard situations. During loading and unloading operations, transport vehicles shall remain off until all containers are loaded onto the vehicle or offloaded into their appropriate cell.

Protection of hazardous waste from other ignition sources, such as an open flame or smoking, shall be achieved by exclusion of unauthorized personnel and posting of non-smoking signs at the CSU boundary, its exterior walls, and along the DLADS peripheral fence. Cutting, welding, soldering, sanding, etc., of containers shall be expressly forbidden. Any maintenance activity that may require these types of operations cannot be conducted in any portion of the facility until the ignitable wastes have been moved to the outdoor storage area. If such activities are required in the outdoor storage area, the waste must be relocated into the building or staging area for the duration of the activity. Protection from radiant heat is provided by the ventilated design of the building.

All containers used to store wastes must be in good condition and meet applicable DOT specifications. Containers that hold ignitable wastes usually have a minimum of 3 inches of outage to allow for pressurization due to vaporization of contents. Containers shall be inspected upon receipt, weekly thereafter, and prior to loading for off-site transportation.

Reactive wastes stored in the CSU include lithium batteries, pesticides, and spent plating wastes. These wastes are generated infrequently. During storage, these wastes shall be separated from acidic wastes by cell dividing walls in the indoor storage area. If placed in the outdoor storage area or the staging area, reactive waste shall be segregated from other waste and placed in a designated secondary containment pan. This procedure is designed to prevent accidental mixing with other waste, in the event of a spill.

During storage, hazardous waste containers shall remain closed unless it is necessary to transfer the waste due to container leakage. If emergency transfers are necessary, proper specification containers shall be used for repackaging the waste. Occasionally, it will be necessary for contractors who are taking the waste to an off-site treatment, storage, and disposal facility (**TSDF**) to open containers to confirm contents by visual inspection.

The CSU is authorized under the Toxic Substances Control Act (**TSCA**) to accept PCB waste. Equipment containing PCBs in concentrations greater than 50 parts per million is regulated by TSCA. If the equipment containing the PCBs is not leaking and is in good condition, the equipment (e.g., transformer) can be stored on a pallet without overpacking the item. However, if the equipment is leaking, it shall be overpacked in a compatible container as required by 40 CFR §761-§765(c)(5) and (6) and applicable DOT requirements.

Final Disposition of Wastes

All contractors that transport, store, treat, or dispose of hazardous wastes from the CSU have been assessed and deemed acceptable by DLADS. No transporter or treatment, storage, and disposal facility shall pick up or manage hazardous waste without a U.S. Environmental Protection Agency identification number.

Attachment E

PERMIT ATTACHMENT E
SECURITY PLAN

Introduction

The information contained in this Attachment addresses security procedures and describes available security equipment at the Holloman Air Force Base (**HAFB**) Container Storage Unit (**CSU**), as required by 20.4.1.500 NMAC, incorporating 40 CFR §264.14. These procedures shall prevent the unknowing entry and minimize the possibility for the unauthorized entry of persons and wild life onto the active portion of the CSU.

24-Hour Surveillance

Traffic access to HAFB is provided only by Highway 70 that traverses the southern boundary of the Base and La Luz Gate on the eastern boundary. Access can also be gained from White Sands Missile Range, which is a restricted access government installation. Armed guards man the entrances to the Base from Highway 70 24 hours per day. In addition, military police patrol the Base round the clock at regular intervals. These surveillance measures ensure that the CSU is continuously monitored and entry to the site is controlled.

Barrier and Means to Control Entry

The CSU is located within HAFB, a fenced military installation, which has closely controlled points of entry. Active and retired military members and civilian employees are required to either show personal identification or a vehicle identification decal in order to enter one of the two entry gates to the Base. Visitors must sign in and out and carry a visitor's pass.

Entry to the CSU, which, is part of the fenced Defense Logistics Agency Disposition Services (**DLADS**) is monitored during duty hours by trained DLADS personnel. Entry to the CSU may only be gained by passing through the Base Administration building after entering its single lockable entry door. All visitors to the CSU must sign in at the Administration building. Visitors must be accompanied by DLADS personnel at all times while visiting the CSU. During off-duty hours, the DLADS yard gate and the Administration building door are locked. The CSU doors shall remain locked except during loading, unloading, or inspection operations. Keys to these doors are

maintained in a locked safe located in the DLADS Administration building. The safe may be opened only by authorized personnel. If the CSU keys are removed from the safe, the authorized person must sign for their possession and log out when the keys are returned to the safe. Military police specifically patrol the DLADS area. Ample night-lights allow the Military police to check the CSU with ease. Two-way radios allow them to report any incident immediately.

Access to the CSU is further be controlled by a secondary security system that includes a fence around the perimeter of the DLADS complex. The DLADS complex, which includes the CSU, is encircled by a 6-ft high chain-link security fence topped by three strands of barbed wire. The fence abuts the DLADS Administration building (Building 112) at the building's southwest and northeast corners, completely enclosing the DLADS yard. The four openings that interrupt the enclosure include the three lockable entry doors of the DLADS Administration building and the Warehouse (Building 115) along with the lockable yard gate located between these buildings. All of these four openings remain locked during duty hours and are monitored by DLADS personnel. All entrances are locked after duty hours.

Warning Signs

Warning signs stating, "***DANGER UNAUTHORIZED PERSONNEL KEEP OUT,*** and ***HAZARDOUS WASTE STORAGE FACILITY"*** shall be posted at the entry point of the DLADS and at the south end of the CSU, respectively. ***"DANGER, UNAUTHORIZED PERSONNEL KEEP OUT"*** signs shall also be posted on the east and north sides of the CSU. The signs shall be legible at distances greater than 25 ft. Both of the above signs shall be written in English and Spanish. In addition, "*No Smoking*" and/or "*Ignition Sources Prohibited*" signs shall be present at the DLADS yard entrance and along all four sides of the CSU building. These signs shall also be all written in both English and Spanish. The west side of the CSU is adjacent to the west fence surrounding the DLADS complex. Consequently, there is no approach from the west side. The only active portion of the CSU where hazardous waste is loaded, unloaded, managed, stored, or otherwise managed, is the south side of the CSU.

Attachment F

PERMIT ATTACHMENT F
INSPECTION PLAN

General Inspection Requirements

Holloman Air Force Base Defense Logistics Agency Disposition Services (**DLADS**) personnel shall perform regular inspections of the Container Storage Unit (**CSU**) as required by 20.4.1.500 NMAC, incorporating 40 CFR §264.15. The inspection schedule for the CSU is provided in Table F-1. During inspections, DLADS personnel shall check for malfunctions, deterioration of structures and equipment, operator errors, and discharges (e.g., leaks or spills).

Unit-Specific Inspection Requirements

The unit-specific inspection requirements for the CSU are listed below. There are no tanks, waste piles, surface impoundments, incinerators, landfills, land treatment units, or miscellaneous units at this CSU.

Containers

Inspection of the CSU shall be done in accordance with the requirements specified by 20.4.1.500 NMAC, incorporating 40 CFR §264.174, which requires at least weekly inspections of the areas where containers holding hazardous waste are stored. During these weekly inspections, a DLADS inspector, who is trained in hazardous waste management and storage procedures shall check for leaking containers and deterioration of containers and the containment system caused by corrosion or other factors. Areas subject to spills, such as the staging area where wastes are loaded and unloaded shall be inspected daily when in use.

Air Emissions

There are separate inspection requirements in 20.4.1.500 NMAC, incorporating 40 CFR §264.1088 to ensure that organic air emissions from containers holding hazardous waste are controlled. Further information regarding compliance with these requirements is presented in Permit Attachment C, *Container Storage Unit Design and Operation.*

Written Inspection Schedule

DLADS personnel shall use the inspection schedule contained in Table F-1 for checking CSU-specific structures; monitoring equipment; safety and emergency equipment; security devices;

communications systems; and operating and structural equipment, such as the forklift, curbs, and sumps that are important in preventing, detecting, or responding to potential environmental or human health hazards. The schedule identifies potential problems for which DLADS inspectors shall check during weekly facility inspections. The inspection schedule shall be maintained at the CSU.

Inspection Frequency

The inspection frequencies noted in Table F-1 are based on the rate of deterioration of the equipment and probability of an environmental or human health incident if the deterioration, malfunction, or any operator error goes undetected between inspections. The frequency of inspections may vary for the items listed on the inspection schedule as noted in 20.4.1.500 NMAC, incorporating 40 CFR §264.15(b)(4).

Area/Equipment	Specific Item	Potential Problems	Frequency of Inspection
Equipment			
	Fire alarms	Power failure	Annually
Container Storage Area	Container placement	Aisle space, insecure placement	Weekly
	Container stacking	Containers stacked more than two high	Weekly
	Sealing of containers	Open lids, leaks	Weekly
	Labeling of containers, Odor, Fumes, Loadind/Unloading Areas, Debris, Pallets (Broken wood? warping/, nails missing?)	Improper identification, incorrect documentation, identification missing, obscured or incomplete label	Weekly
	Segregation of Incompatible Waste	In same cell, Transfer containers previously used, waste in wrong cell	

Remedial Action for Inspection Deficiencies

DLADS personnel shall be responsible for seeing that deterioration or malfunction of equipment or structures revealed during an inspection is repaired on a schedule that ensures that the problem does not lead to an environmental or human health hazard. If inspections reveal that non-emergency maintenance is needed, then DLADS personnel shall initiate actions to preclude further damage and reduce the need for emergency repairs. If a hazard is imminent or has already occurred during the course of an inspection or any time between inspections, then remedial action will immediately be taken. The general nature of the remedial action to be taken shall be noted in the inspection log.

Inspection Log

All inspections of the CSU shall be recorded by the DLADS inspectors in an inspection log. The inspection log includes spaces for the date, time of inspection, name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions. The inspection logs shall be kept on file at the CSU. These records shall be maintained for at least three years from the date of the inspection.

Attachment G

decontamination equipment includes three eyewash and safety shower stations that are accessible from the indoor and outdoor storage buildings.

- **Water at adequate volume and pressure to supply water hose streams.**

  Water for fire control is not directly available at the unit. The Base Fire Department trucks are available at all times for emergency response. Fire-fighting vehicles are fitted for connection to the two nearby fire hydrants located approximately 120 yards north and 50 yards southwest of the CSU. These hydrants can deliver 750 gallons per minute of flow at a pressure of 50 psi.

Testing and Maintenance of Equipment

All facility communication and alarm systems, fire protection equipment, spill control equipment, and decontamination equipment shall be inspected, tested, and maintained as necessary to assure its proper operation in time of emergency. Permit Attachment I, Table I-1, *Records Retention Times,* provides time frames for performing these checks.

Access to Communications or Alarm Systems

Whenever employees are handling containerized hazardous waste, they have access to telephones in both the Defense Logistics Agency Disposition Services (**DLADS**) Administrative Building (Building 112) and the indoor container storage area (Building 118). Employees also wear a two-way hand-held radio when working at the CSU. The fire alarm located at the CSU also provides immediate emergency notice to the Base Fire Department. Each of these pieces of equipment is capable of summoning external emergency assistance. If there is ever just one employee on the premises while the facility is operating, he or she has access to all of the communications and alarm system discussed above.

During non-operational hours (e.g., at night), Holloman Air Force Base Security Forces Squadron provides security checks of the outer fence of the DLADS complex to ensure that the storage building is secure.

External communication capabilities are provided through the Base Operator. Communications systems include the Defense Switching Network and U.S. West Communications, both of which allow communication with other Air Force Bases as well as off-site personnel.

Required Aisle Space

Management of Ignitable, Reactive, and Incompatible Wastes

The prevention of accidental ignition or unplanned reaction of ignitable, reactive, or incompatible waste is achieved by a combination of facility design and operating practices. The design standards and operating practices related to accident prevention are presented in Permit Attachment C of this Permit.

Hazard Prevention Procedures, Structures, and Equipment

This section provides a description of the handling techniques and facility design standards that prevent hazards from occurring that would endanger human health or the environment. The procedures, structures, and equipment associated with the operation of the CSU are designed to prevent hazards, such as spills, fires, or mixing of incompatible wastes that are posed by the wastes at the facility.

Permit Attachment C of this Permit describes the container management practices, including procedures to prevent spills or ruptures during loading and unloading activities, run-on and run-off prevention measures, and proper management and storage procedures.

Drain Lines

The closest sanitary sewer drain lines are located approximately 100 yards north of the CSU at the DLADS Administration building. The nearest storm sewer is located approximately 50 ft southeast of the facility.

Equipment Failure and Power Outages

The Container Storage Unit only manages and stores containerized waste; therefore no automatic waste feed cutoff systems exist. In the event of a brief power interruption, all waste-handling and inspection activities cease until power shall be restored. Loaded forklifts shall complete a single transfer operation, if so engaged. Otherwise, only spill cleanup activities would continue under the circumstances using natural light that enters the building through the open garage doors.

Personnel Protective Equipment

Attachment J

PERMIT ATTACHMENT J
PERSONNEL TRAINING

Introduction

Holloman Air Force Base (**HAFB**) personnel that manage and store hazardous wastes shall successfully complete a program of classroom instruction and/or on-the-job training to prepare them to operate and maintain the Container Storage Unit (**CSU**) in a safe manner and ensure the Facility's compliance with New Mexico Hazardous Waste Management Regulations 20 NMAC 4.1. No employee shall work unsupervised until he/she has completed either the formal training course or equivalent on-the-job training. This training shall be completed within six months of assignment to working with hazardous waste at the CSU.

Defense Logistics Agency Disposition Services (**DLADS**) Headquarters offers a complete environmental training program in managing, storing, and transporting hazardous wastes. That training program shall comply with the training requirements of 20.4.1.500 NMAC, incorporating 40 CFR §264.16(a)(3). All HAFB employees involved in waste management and storage at the CSU or who manage and store hazardous wastes shall be required to participate in the program. HAFB personnel shall be enrolled in the DLADS hazardous waste training program by their regional DLADS office.

Job Titles and Duties for Which Training is Required

The duties, responsibilities, and qualifications related to the positions responsible for managing and storing hazardous wastes at the CSU are as follows:

Position/Title: Defense Logistics Agency Disposition Services (**DLADS**) Chief.

Responsibilities: This individual shall direct the operations of the surplus property program at the HAFB, administer the disposal program at the HAFB, provide assistance and guidance to commands served, and shall be the technical authority on all disposal matters. The DLADS Chief shall ensure that personnel receive adequate training.

Major Duties: The major duties of the DLADS Chief also include:

- Interpreting regulations and developing necessary operating procedures.
- Processing an extremely wide variety of materials ranging from commonly used items to highly specialized items, including hazardous waste;

- Determining requirements for manpower, space, or equipment, and initiating necessary requisitions;
- Determining the need for modifications to existing facilities and initiating action to improve economy, efficiency, safety, and physical security of operations;
- Developing operating requirements and initiating requests for work;
- Maintaining personal contacts with Local and State government agencies, military commands, and the General Services Administration; and
- Delegating workload of subordinate employees based on difficulty and the degree of training. The HAFB Chief shall be invested with decision-making authority for resolution of work-related problems.

Position/Title: Environmental Protection Specialist

Responsibilities: The Environmental Protection Specialist shall serve as the HAFB hazardous waste management and storage focal point and shall advise the DLADS Chief on hazardous waste matters. He/she shall be responsible for ensuring compliance with requirements related to receiving, managing, storing, packaging, and disposing of hazardous waste. This specialist shall provide technical guidance to HAFB personnel in all aspects of hazardous waste processing.

Major Duties: The primary duties of the Environmental Protection Specialist shall include:

- Conducting periodic inspections to ensure that hazardous waste storage areas are maintained in accordance with pertinent State and Federal government regulations, and that hazardous waste turned in by generating activities is properly identified and packaged;
- Acting as the Emergency Coordinator at the CSU; reacting to spillage by containing, cleaning up, and decontaminating the spill site;
- Analyzing data and preparing hazardous waste reports as required; and
- Assisting DLADS personnel in providing on-the-job training for HAFB personnel involved with hazardous waste management operations.

Position/Title: Material Sorters and Classifiers

The training program employed by DLADS for employees managing and storing hazardous wastes shall combine supervised on-the-job instruction and formal classroom training. Each employee shall learn about the particular dangers associated with hazardous wastes typically stored at HAFB and proper management and storage requirements. The on-the-job training shall provide HAFB employees working at the CSU with experience in the following areas:

- Physical layout of the CSU buildings, particularly the location and use of emergency equipment and systems (i.e., how to operate alarm systems);
- Basic hazardous waste disposal policies of HAFB (turn-in requirements, analysis, packaging, and record keeping);
- Basic procedures in handling, storing, and manifesting of hazardous waste;
- Inspection techniques and corrective action techniques for potential inadequacies;
- Emergency response procedures for spills, fires, explosions, shutdown of operations, evacuation procedures; and
- Procedures for how to use and inspect facility emergency and monitoring equipment.

The topics covered in the training course shall provide the employee with an understanding of potential hazards inherent in the job, as well as with the precautions necessary to minimize these hazards. In addition, HAFB personnel who manage and store hazardous wastes will meet annually to discuss the effectiveness of their training programs and recommend program needs. The initial training shall be reviewed annually to update personnel on regulatory changes, review requirements, and review operating procedures. The Spill Response Plan described in Permit Attachment H, *Appendix H-1*, shall be executed at least once annually for training purposes.

Personnel Training

Training shall be required for all HAFB personnel involved with hazardous waste management and storage at the CSU as outlined in the previous sections. The courses discussed shall provide instruction in the safe management and storage of hazardous wastes. Training shall also be provided in emergency response actions, in the use of protective gear, and personal safety. The course shall focus on regulatory compliance. In addition to these minimum training requirements, all on-site/on-Base transporters of hazardous waste shall be provided with specific training for transporting hazardous wastes. The training course shall include fundamental hazardous waste management concepts and shall provide information on how to implement the contingency plan outlined in Permit

Attachment H. The DLADS environmental/safety training program shall fulfill regulatory requirements for the environmental/safety training program. The DLADS training course, at a minimum, shall consist of:

< Hazardous waste identification	< Hazardous waste profiles
< Accumulation time frames	< Operating records
< Container management	< Recordkeeping/documentation
< Emergency Plan	< Waste analysis
< Inspections	< Land disposal restrictions
< Applicable OSHA requirements	< Applicable DOT requirements

The Facility Environmental Flight shall also provide annual training for its hazardous waste satellite and 90-day accumulation point managers. The same program shall be used for all hazardous waste managers, including those at the CSU. The training shall be offered monthly. Training program course materials shall be maintained on file and shall be available upon request.

Implementation of Training Program

All current HAFB employee and future employees assigned to manage and store hazardous wastes shall complete the initial and annual refresher-training program within six months from their date of employment.

No employee shall work with hazardous wastes unsupervised until he/she has successfully completed on-the-job training. Formal training programs shall be attended by personnel as required by their duties.

Retention of Records

All records documenting the job title for each position, job description, employee's names, and completed training programs (both introductory and review) shall be kept on-site in the HAFB Administration Office located adjacent to the CSU. These records shall be kept until closure of the CSU for current employees and for three years from the date of termination for former employees.

Attachment K

PERMIT ATTACHMENT K
CLOSURE PLAN

Overview of the Closure Plan

This Closure Plan for the Holloman Air Force Base (**HAFB**) Container Storage Unit (**CSU**) is designed to meet the following performance standards:

- To protect human health and the environment;
- To remove all hazardous waste and hazardous waste residues from the CSU at the time of closure and to decontaminate or remove any remaining containers, liners, bases, and soil containing or contaminated with hazardous waste or hazardous waste residues; and
- To minimize or eliminate the need for future maintenance or monitoring.

This plan identifies the steps that HAFB shall take to close the subject hazardous waste management unit at the end of its intended operation life and achieve clean closure. Holloman Air Force Base DLADS Environmental Coordinator shall maintain a copy of the submitted Closure Plan and all revisions to the plan. Revisions shall be made whenever any modifications are made to the existing equipment, structures, instruments, or procedures related to the management of the CSU. The procedures for meeting these goals are outlined in this section.

Applicability

The DLADS shall provide management and storage capacity for containerized hazardous waste generated on-site (i.e., at HAFB). Treatment of wastes shall not be performed at the CSU, and wastes generated off-site shall not be accepted for management and storage. The CSU consists of a staging area, outdoor storage area, and indoor storage building. The staging area and outdoor storage area consist of diked concrete pads that are outdoors. These portions of the CSU are intended only for waste-handling and accumulation-type activities. Also, because the CSU contains only containers (e.g., steel drums) that hold hazardous waste, ground water monitoring requirements shall not be applicable. However, if HAFB fails to achieve clean closure or cannot demonstrate equivalency clean closure, the CSU shall be closed in place as a landfill, and detective ground water monitoring shall be conducted as per 20.4.1.500 NMAC, incorporating 40 CFR §264.98. This shall be done using the procedures submitted with the post-closure care plan. This Closure Plan identifies the steps necessary to close the CSU at any point during its active life.

Closure Performance Standard

Prior to the initiation of closure activities, a notice of intent to close the Unit shall be sent to NMED. At the time formal notification to proceed with closure is submitted, no additional wastes shall be accepted at the CSU. Any waste inventory in the CSU at this time shall be sent off-site for treatment and disposal in accordance with all applicable regulatory requirements.

All CSU structures, equipment, and related items shall be decontaminated by trained personnel wearing appropriate personal protective equipment as required by 40 CFR 1910.120, Appendix B. Representatives from the following organizations shall determine the level of protection required collectively:

- Defense Logistics Agency Disposition Services/Holloman;
- Defense Logistics Agency Disposition Services/Battle Creek;
- Holloman AFB Civil Engineering Squadron/Environmental Flight; and
- Holloman AFB Bio-environmental Engineering Office

All visible signs of contamination shall be removed using water and detergent. All waste storage area floors, containment trenches, and walls shall be cleaned using high-pressure steam cleaning equipment. All washings (rinsates) shall be collected, stored, and analyzed. If the analysis indicates that the wash is hazardous, it shall be placed in appropriate containers, appropriately labeled, and disposed of as hazardous waste. If the analysis indicates there is no evidence of contamination, the water shall be discharged into the sewer system. Other areas in which the hazardous wastes were handled and the associated containment facilities shall be decontaminated in a similar manner.

Decontamination and Closure Criteria for Rinsate and Soil

A composite sample, as defined in *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, EPA Publication SW-846,* shall be collected and analyzed from the collective samples of each decontamination phase. The analysis shall include procedures designed to detect possible contamination that could have resulted from those hazardous chemicals that have been included on the chemical inventory lists of the CSU over its operation lifetime. The specific analytical method shall be indicated in the initial notice of intended closure when it is submitted to the NMED for approval.

Equipment Decontamination

All CSU equipment shall be moved into the storage building for decontamination. Pallets that were used for container placement shall be dismantled, containerized, and disposed of as hazardous waste if any visible signs of contamination are present. Pallets that do no exhibit visible signs of contamination shall be retained for future use at Holloman AFB. Storage racks from the outdoor storage area shall be dismantled, moved inside the storage building, and initially decontaminated by a high-pressure rinse consisting of hot water or steam and anionic surfactant. This rinsate shall be collected and disposed of as hazardous waste if necessary. On completion of the initial wash, a second rinse shall be applied. The second rinse shall be collected and sampled for the decontamination criteria. Forklifts and tools used during the active life of the CSU shall be moved into the storage building and decontaminated in a similar fashion.

After completion of the initial two-rinse decontamination sequence, a subsequent rinse of hot water or steam followed by cold tap water shall be applied. These rinsates shall be collected and sampled for the decontamination criteria. No further decontamination efforts shall be undertaken until analytical results are received that indicate such actions are warranted. If the decontamination criteria are not being met, these steps shall be repeated. When the criteria are met, these items shall be transferred to the DLADS zone for re-utilization.

During the closure activities, workers shall wash down equipment and instruments, remove protective clothing, and undergo decontamination in this area on a daily basis. Entrance to or exit from the CSU during the closure activities shall occur through this zone. Upon completion of CSU decontamination efforts, all equipment shall be moved to this zone for final cleaning. The final cleaning shall be performed by steam cleaning followed by a tap water rinse.

After equipment decontamination, the outdoor portions of the CSU shall be demolished if necessary. Rubble shall be collected for disposal as non-hazardous solid waste.

Outdoor Storage Area Decontamination

After decontamination of the storage racks and operating equipment, the staging area and covered outdoor storage area shall be decontaminated. The curbs, pad surfaces, and containment basins of these areas shall be steam cleaned with water containing surfactant. If necessary, a vacuum nozzle attachment shall be fitted to the suction line to remove all freestanding liquids in the containment

Any grates, aisle spaces, or forklift ramps that are near a cell shall be decontaminated as a portion of that cell. CSU walls, to a height of 10 ft, shall also be considered a portion of the corresponding cell.

Groundwater Monitoring, Leachate Collection, and Run-on and Run-off Control

Because the CSU shall be clean closed and no hazardous waste or hazardous constituents shall remain on-site, groundwater monitoring, leachate collection, and run-on/run-off controls shall not be necessary. However, if HAFB cannot achieve clean closure of the CSU, groundwater detection monitoring shall be conducted, as required by 20.4.1.500 NMAC, incorporating 40 CFR §264.98.

Closure Plan Amendments

HAFB shall submit a written notification or request for a permit modification to authorize a change in operating plans, facility design, or the approved Closure Plan in accordance with the applicable procedures in 20.4.1 NMAC. The notification shall be submitted to NMED at least 60 days in advance of the proposed change and no later than 60 days after an unexpected event has occurred. The written notification or request shall include a copy of the amended Closure Plan for review and approval by NMED.

Closure Notification Requirements

HAFB shall notify NMED at least 45 days prior to the date that closure of the CSU shall begin.

Closure Schedule

The anticipated date of closure is 2011. This date is based on the expected service life of the CSU design. Closure of Holloman AFB and its tenant DLADS is not anticipated by this date as the Department of Defense components at Holloman AFB are an integral part of the defense system of the United States. Table K-1 presents a schedule for accomplishment of the closure action. The closure activities shall be completed within 180 days of receipt of the final volume of hazardous waste. 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 shall be requested from the NMED in accordance with 40 CFR §264.113(b).

Certification of Closure

After closure activities are completed, an independent professional engineer registered in the State of New Mexico shall certify the closure. This engineer shall be provided access to the Closure Plan, the site during the closure activities, and all analytical results. Certification of closure of the CSU shall be provided to NMED by registered mail or hand delivered within 60 days of completion. The