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**FEDERAL FACILITIES  
QUARTERLY COMPLIANCE REPORT  
SECOND QUARTER 1995**

**ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
DALLAS, TEXAS**

**Prepared by:  
Federal Activities Branch  
Reporting Period: 01/01/95 - 03/31/95**

1739





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

JUN 1 2 1988

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The U.S. Environmental Protection Agency's (EPA) primary goal for the Federal Facilities Compliance Program is to help "ensure that Federal agencies achieve compliance rates in each media program that meet or exceed those of major industrial and major municipal facilities." The enclosed report has been prepared to facilitate in the analysis and comparison of Federal facilities compliance rates. The information it contains is based primarily on data received from each of the major EPA program areas (Air, Water, Hazardous Waste Management). We feel that it is useful to distribute this data as a means of fostering communication among EPA, the States, and the Federal community in Region 6.

Enclosed is a copy of the latest Federal Facilities Quarterly Compliance Report for your information and use. If you have any questions or comments regarding the report, please feel free to contact Joyce Stubblefield, Acting Regional Federal Facilities Coordinator (6E-FF), at the above address, or by calling (214) 665-6430.

Sincerely,

A handwritten signature in black ink, appearing to read "Russell F. Rhoades".

Russell F. Rhoades, Director  
Environmental Services Division

Enclosure



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**ENVIRONMENTAL PROTECTION AGENCY**

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Office of Federal Facilities Enforcement

Regional Federal Facilities Coordinators

**MAJOR FEDERAL FACILITIES**  
**NON-COMPLIANT**

**ARKANSAS**

Base Commander, Eaker AFB

**LOUISIANA**

**NEW MEXICO**

Director of Operations, Los Alamos National Laboratory ✓

**OKLAHOMA**

Warden, El Reno Federal Prison  
Commander, Fort Sill

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**TEXAS**

Base Commander, Bergstrom AFB

Base Commander, Dyess AFB

Base Commander, Kelly AFB

Base Commander, Reese AFB

Commander, Lackland AFB Training Annex

Commander, Camp Stanley

Commander, Fort Bliss

Commander, Fort Hood

Commander, Lone Star Army Ammunition Plant

Commander, Longhorn Army Ammunition Plant

Commander, Red River Army Depot

Commanding Officer, Corpus Christi Naval Air Station

Commanding Officer, Dallas Naval Air Station

## EXECUTIVE SUMMARY

This is the Federal Facilities (FF) Quarterly Report for the quarter ending March 31, 1995. This report reflects the multi-media involvement and compliance status of major and significant minor FFs in EPA Region 6. Comments or questions regarding this report should be directed to: Ms. Joyce Stubblefield, Acting Regional Federal Facilities Coordinator (6E-FF), EPA Region 6, 1445 Ross Avenue, Dallas, TX 75202-2733; or at (214) 665-6430.

On the attached Part A tables, an asterisk (\*) prior to the compliance status and name of a FF indicates that a change has occurred in the compliance status during this quarter for that FF. There are a total of 24 media violations shown in the statistics tables in this report: RCRA = 15; CAA = 5; NPDES = 3; and TSCA = 1. Where appropriate, brief explanations of problems and/or actions at violating Federal facilities are included in Part B. Part B also contains a brief statement of all individual open violations. Those FFs identified as SNC during the quarter are listed below and an X has been entered in the left SNC column in the statistics table. The media program definitions of a major source and a significant violator are listed in the Appendix at the end of this report.

### SIGNIFICANTLY NON-COMPLIANT (SNC) FACILITIES -- BY STATE

(14 SNC Violations at 12 Facilities)

#### ARKANSAS

1. Eaker AFB (RCRA)
2. Little Rock AFB (CAA - Contractor)
3. Pine Bluff Arsenal (NPDES)

#### NEW MEXICO \*

1. Los Alamos Nat'l Lab. (CAA, RCRA)

#### OKLAHOMA

1. El Reno Federal Prison (RCRA)
2. McAlester Army Ammu. Plant (NPDES)

#### TEXAS

1. Camp Stanley (RCRA)
2. Dyess AFB (RCRA)
3. Fort Bliss (CAA, RCRA)
4. Fort Hood (RCRA)
5. Fort Sam Houston (TSCA)
6. Lackland AFB Annex (RCRA)

### CHANGE IN SNC STATUS SINCE LAST REPORT

White Sands Missile Range (RCRA)  
Reese AFB (RCRA)

### FFs WITH MULTIPLE SIGNIFICANT VIOLATIONS

Los Alamos Nat'l Lab., NM (CAA, RCRA)  
Fort Bliss, TX (CAA, RCRA)

### RETURNED TO COMPLIANCE THIS QUARTER

White Sands Missile Range (RCRA)  
NASA LBJ Space Center (RCRA)  
LA Army Ammunition Plant (RCRA)

\* NASA White Sands Test Facility removed from SNC list due to facility operating under FFCA for the violation.

January 1 - March 31, 1995

**SIGNIFICANTLY NON-COMPLIANT (SNC) FACILITIES -- BY MEDIA**

(14 SNC Violations at 12 Facilities)

**AIR Media**

1. Little Rock AFB, AR (Contractor)
2. Los Alamos Nat'l Lab., NM
3. Fort Bliss, TX

**WATER Media**

1. Pine Bluff Arsenal, AR
2. McAlester Army Ammu. Plant, OK

**TSCA Media**

1. Fort Sam Houston, TX

**RCRA Media**

1. Eaker AFB, AR
2. Los Alamos Nat'l Lab., NM
3. El Reno Prison, OK
4. Camp Stanley, TX
5. Dyess AFB, TX
6. Fort Bliss, TX
7. Fort Hood, TX
8. Lackland AFB Training Annex, TX

**OTHER RCRA VIOLATIONS -- NON-SNC (12)**

**CLASS 1**

**ARKANSAS**

**LOUISIANA**

**NEW MEXICO**

Los Alamos National Laboratories

**OKLAHOMA**

El Reno Federal Prison  
Fort Sill

**TEXAS**

Bergstrom AFB  
Corpus Christi NAS  
Dyess AFB  
Fort Hood  
Kelly AFB  
Lackland AFB Training Annex  
Lone Star Army Ammunition Plant  
Longhorn Army Ammunition Plant  
Red River Army Depot  
Reese AFB

## FEDERAL FACILITY STATISTICS

Major & Significant Minor Federal Facilities  
Media Program Involvement - Region 6

JANUARY 1 - MARCH 31, 1995

PART A  
PAGE 1 of 2

MAJOR-(PER AIR, WATER AND/OR RCRA PROGRAM DEFINITION)				COMPLIANCE STATUS						LAST INSPECTION DATES				OTHER			
				NPD ES	CAA	RCRA	CER CLA	TSCA	SDWA	UIC	NPDES	CAA	RCRA		TSCA		
W	A	R	T	FACILITY	ST												
		X		1. EAKER AFB (BLYTHEVILLE)	AR	TV		M#					05/90	12/94	07/92		
				2. EPA INCINERATION RESEARCH FAC.	AR		LC	MC	W	Q				03/94			
				3. FORT CHAFFEE	AR	MS		MC				01/95	09/93	07/94	07/85	REALIGN.ACTIV.,ST.ISS.NPDES ORDER 5/10/94.	
X	X			4. LITTLE ROCK AFB	AR	LC	-#	MC	I	Q			01/94	03/93	06/87		
				5. PINE BLUFF ARSENAL	AR	M#	MC	MC	I	Q		09/94	05/94	04/94	11/84		
				6. BARKSDALE AFB	LA	LV	MC	MC	I	Q			03/94	01/95	06/85		FF CLOSING PROPOSED REDUCTION NPL SITE. UNDER IAG (PSD SOURCE)
				7. ENGLAND AFB	LA		LC	MC	I	Q			01/91	12/92	05/92		
				8. FORT POLK	LA	MC	LC	LC	I	Q		05/94	05/94	07/94			
				* 9. LA ARMY AMMUNITION PLANT	LA	MC	MC	*MC	I	Q		05/94	02/95	03/95	08/81		
				10. MICHOUJ MAF (MARTIN-MAR.)	LA	LC	MC	MC	B	Q			11/93	02/95	05/94		
				11. SAINT JAMES TERMINAL	LA	LC	MC	-	-	Q			09/93				
				12. CANNON AFB	NM	-	-	MS	I	Q			03/95	12/93	04/89	NESHAP SOURCE, START-UP IMMINENT	
				13. DOE WASTE ISOL. PILOT PROJECT	NM	-	Q	MC									
				14. FORT BLISS MCGREGOR RANGE	NM	-	-	MC						03/95	01/90	NPDES ORDER ISSUED TO UNIV. OF CAL. 6/94	
				15. HOLLOMAN AFB	NM	-	LC	MS	I	Q			06/94	12/94	05/84		
				16. KIRTLAND AFB	NM	Q	MC	MC	I	Q			09/94	11/94	11/90		
X	X			17. LOS ALAMOS NATIONAL LAB.	NM	MS	M#	M#	I	Q		11/91	08/94	12/94	03/92		
				18. NASA WHITE SANDS TEST FF	NM	-	-	MS	B	Q			08/93	06/94	08/86		
				19. SANDIA LABORATORIES	NM	-	LV	MC	I	Q			01/94	05/94	12/88		
				20. USAF MELROSE RANGE	NM	-	-	MC						12/93			
				*21. WHITE SANDS MISSILE RANGE	NM	-	-	*MC	I	Q			04/94	03/95	05/81		
				22. AFP #3(MCDON./ROCK.,TULSA)	OK	MC	MC	MC	I	Q		04/94	07/94	09/94	10/92		NPL SITE-UNDER IAG
				23. ALTUS AFB	OK	-	MC	MC	I	Q			01/92	08/94	03/87		
				24. EL RENO FEDERAL PRISON	OK	-	-	M#	-				11/92	11/93			
				*25. FORT SILL	OK	MS	MC	*MV	W	Q		06/93	10/94	01/95			
X				26. McALESTER ARMY AMMO. PLANT	OK	M#	MC	MC	I	Q		11/94	10/94	03/95	12/88		
				27. TINKER AFB	OK	MV	MC	MS	I	Q		06/94	05/94	12/94	02/92		
				28. VANCE AFB	OK	LC	MC	MC	I	Q			06/94	12/94	07/85		
				29. A.F.PLANT #4 (LOCKHEED)	TX	MC	MC	MC	I	Q		06/94	06/91	03/94	07/85	NPL SITE (IAG) CONVERT TO CIVILIAN AIRPORT NSPS SOURCE	
				30. BERGSTROM AFB	TX	-	LC	MV	I	Q			01/88	04/94	06/92		
				31. BIG HILL S.P.R. SITE	TX	LC	MV	-	I	Q					08/85	NSPS SOURCE	
				32. BRYAN MOUND S.P.R.	TX	LC	MC	-	I	Q			08/90		07/85		
				*33. CAMP BULLIS	TX			*MC						01/95		REALIGNING TO NAS	
				34. CARSWELL AFB	TX	LC	TS	MC	I	Q			08/92	10/94	08/89		
				35. CORPUS CHRISTI ARMY DEPOT	TX	-	MC		W	Q			03/94				
				36. CORPUS CHRISTI NAS	TX	MC	MC	MV	I	Q		10/92	03/94	07/94	07/87	FF CLOSING	
				37. DAL.NAV. WEAP. PLANT (NAV.VOUGHT	TX	-	MC	MC	I	Q			01/95	03/94	03/82		
				38. DALLAS NAS	TX	-	LC	MC	W	Q				06/94	03/82	FF CLOSING	
				39. DYESS AFB	TX	-	LC	M#	I	Q			11/92	06/94	03/87		
				40. FORT BLISS	TX	-	M#	M#	W	Q			09/92	06/94	03/94	NESHAP VIOLATION	
				41. FORT HOOD	TX	LC	-	M#	W	Q				12/94	12/90		
				42. KELLY AFB	TX	MC	MC	MV	I	Q		04/93	03/94	04/94	10/92		
X	X	X		43. KERRVILLE USDA FACILITY	TX	-	LC	MC	-	Q				09/89			

FEDERAL FACILITIES STATISTICS

JANUARY 1 - MARCH 31, 1995

MAJOR-(PER AIR, WATER AND/OR RCRA PROGRAM DEFINITION)					COMPLIANCE STATUS							LAST INSPECTION DATES				OTHER	
SNC				FACILITY	ST	NPD ES	CAA	RCRA	CER CLA	TSCA	SDWA	UIC	NPDES	CAA	RCRA		TSCA
W	A	R	T														
		X		44. LACKLAND AFB TRAINING ANNEX	TX			M#		@	@				12/94		
				45. LAUGHLIN AFB	TX	LC	-	MC	I	@	@				12/94	03/87	
				*46. LBJ SPACE CENTER (NASA)	TX	-	-	*MC	I	@	@				02/95	10/84	
				47. LONE STAR ARMY AMMO. PLANT	TX	LC	LC	MV	I	@	-				02/95	12/88	NPL SITE (IAG)
				48. LONGHORN AAP	TX	LC	LC	MV	I	@	@				03/95	07/85	NPL SITE (IAG)
				49. MCGREGOR NWP (HERCULES)	TX	LC	LC	MC	I	@	@				02/94	03/86	
				50. PANTEX PLANT	TX	-	MC	MC	I	@	@			09/90	06/94	09/89	NESHAP RADIONUCLIDE, NPL SITE
				51. RED RIVER ARMY DEPOT	TX	MC	MC	MV	W	@	@		10/93	05/94	01/95	06/93	
				52. REESE AFB	TX	-	-	MV	I	@	@				02/95	06/85	
				53. SHEPPARD AFB	TX	MC	LC	MC	I	@	@		06/94		07/94	12/89	
				54. TEMPLE V.A. MEDICAL CENTER	TX	-	MC	-	-	@	-			04/88		02/90	
				55. WACO V.A. MEDICAL CENTER	TX	-	MC	-	-	@	-			04/88	04/85	03/83	

SIGNIFICANT MINORS-(NOT MAJOR, BUT DESIGNATED SIGNIFICANT BY FF COORDN. DUE TO MULTIMEDIA PROBLEM POTENTIAL)					COMPLIANCE STATUS							LAST INSPECTION DATES				OTHER	
SNC				FACILITY	ST	NPD ES	CAA	RCRA	CER CLA	TSCA	SDWA	UIC	NPDES	CAA	RCRA		TSCA
W	A	R	T														
				1. CARVILLE PHS HOSPITAL	LA	LC	LC	-	-	@	@					04/87	
				2. NEW ORLEANS NAVAL AIR STATION	LA	-	LC	-	I	@	-		12/89	04/93	11/94	04/87	
				3. W. HACKBERRY S.P.R. SITE	LA	LC	LC	-	W	@	-	MC	03/90				
				4. ALBUQUERQUE VA MEDICAL CENTER	NM	-	LC	LC	B	@	@		02/90	02/92	02/90	11/84	
				5. INHALATION TOXIC. R. INSTI.	NM	-	LC			@	@			09/91			
				6. FAA AERONAUTICAL CENTER	OK	-	-	LC	I	@	-			01/92	07/94	04/87	
				7. BASTROP FED. CORRECTION INST.	TX	LC	-	LC	B	@	-				04/93		
		X		8. BROOKS AFB	TX	LC	-	LC	I	@	@			10/89	05/85	10/88	
			X	9. CAMP STANLEY	TX	LC	-	L#	-	@	@				01/93		RCRA FINE
				10. FORT SAM HOUSTON	TX	-	-	LC	W	@	@				02/88	06/92	
				11. GARY JOB CORPS CENTER	TX	LC	-	LC	B	@	@				02/88	10/88	
				12. KINGSVILLE NAS	TX	LC	-	LC	I	@	-				02/95	08/83	
				13. RANDOLPH AFB	TX	LC	LS	LC	I	@	@			12/89	02/94	08/89	

\* INDICATES A CHANGE FOR THIS FF SINCE LAST REPORT

\*\*TOTAL FACILITIES = 68

**FACILITY**  
M Major Source  
L Minor Source  
@ Activities Monitored, but source is not classified as a major or minor source  
- No significant involvement  
T Facility scheduled to be closed, violating process will be discontinued

**LEGEND**

**STATUS**  
C Compliant  
# Significant Non-Complier (SNC), Significant Violator, Violations, not SNC  
S On Schedule with FFCA/Fed. Consent Decree  
I CERCLA Investigation begun  
W CERCLA work completed  
B In CERCLIS, No CERCLA investigation begun

\*\* Does not include 96 additional FF which are regulated but have fewer media involvements and less problem potential. Regulated means the FF is a RCRA Generator (>1,000 kg/mo) or an NPDES Permit has been issued.

**PART B -- BRIEF EXPLANATIONS OF PROBLEMS AND ACTIONS**

The following information is based on information received from media program coordinators, except in the case of RCRA information, which is obtained from an interpretation of the latest RCRIS Report. Acronyms used in the following narrative include:

AO	Administrative Order. In the case of RCRA an AO refers to a 3008(a) order.
FFCA	Federal Facilities Compliance Agreement
HPV	RCRA High Priority Violation
IWTP	Industrial Wastewater Treatment Plant
MCA	Military Construction Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NON	Notice of Noncompliance
NOV	Notice of Violation
PAO	Proposed Administrative Order
PCB	Polychlorinated biphenyls
PSD	Prevention of Significant Deterioration
SIP	State Implementation Plan
STP	Sewage Treatment Plant
TSD	RCRA Treatment, Storage and Disposal Facility
VOC	Volatile Organic Compounds

1. **EAKER AFB, AR --**

RCRA -- One open class 1 TSD violation. The high priority violation (HPV) was for closure and an AO was issued by the State in 8/93 with a scheduled completion date of 11/97.

2. **FORT CHAFFEE, AR --**

NPDES -- Reports for 7/93 through 10/93 indicate that the facility is not complying with certain effluent limitations. The State is working with facility to resolve the noncompliance issues. The reports ending 6/30/94 show the facility to be on schedule with its compliance agreement. Recent reports show violations for Total Suspended Solids (TSS) for 9 & 10/94 at outfall 001

3. **LITTLE ROCK AFB, AR --**

CAA -- State inspections of 11/87 and 1/88 discovered substantive violations of the NESHAP asbestos regulations by Sealtite Corp., a contractor hired by the base. EPA referred case against contractor only to DOJ in June, 1988. Case was filed in Federal district court in 10/88. DOJ has completed a motion for default against Sealtite for failure to respond to a previous motion. Sealtite responded to the default motion. Motion for summary judgment (MSJ) entered by DOJ and court ruled for MSJ in EPA's favor. A penalty of \$15,000 was negotiated with counsel for Sealtite on June 1, 1990. However, on January 7, 1991, after Sealtite had filed for bankruptcy, DOJ recommended that the case be dropped. EPA will likely not pursue the case via a proof of claim, since the source's total assets are \$10,000 and the source owes over \$80,000 in delinquent income taxes. The Air Enforcement Branch sent a memo to Regional Counsel on March 14, 1992, recommending that the case be withdrawn due to the company's financial situation. This recommendation has been forwarded to DOJ. A final decision on the disposition of this case is expected soon.

4. **PINE BLUFF ARSENAL, AR --**

NPDES -- Reports ending 6/30/94 indicate that the facility is not complying with its permit limitation for Total Suspended Solids at Outfall 001 and 003. The State is working with the facility to resolve the compliance issues. Recent reports indicate that the facility has been compliant.

5. **INHALATION TOXICOLOGY RESEARCH INSTITUTE, NM --**

CAA -- Review of the NESHAP annual and inspection reports indicate that this facility is probably in compliance with the emission standard at §1.92 but not in compliance with emission monitoring and test procedure requirements at §61.93.

6. KIRTLAND AIR FORCE BASE, NM --

NPDES -- Kirtland currently has coverage under Storm Water General Permit No. NMR00A148 that became effective 12/31/92. Kirtland is currently in compliance with their permit.

7. LOS ALAMOS NATIONAL LABORATORIES, NM --

CAA -- LANL claims to be in compliance currently with the Radionuclide NESHAP (Subpart H) emission standards at 40 C.F.R. 61.92, but its emission monitoring procedures and reporting do not all comply with §61.93 and §61.94. Annual Reports indicate that shortcomings are being corrected, but achieving full compliance will take some time. Facility operators have met with EPA on numerous occasions on the status and plans for bringing the LANL facility into full compliance, most recently on 3/30/95. A Notice of Noncompliance (NON) was issued on 11/27/91 and the DOE's draft Compliance Plan (CP) and draft proposed Federal Facility Compliance Agreement (FFCA) were received from DOE on 3/13/92. A second NON was issued on 11/23/92 for noncompliance with the emission standard in 1990. DOE provided to EPA the most recent proposed CP on 4/7/95, and the most recent draft proposed FFCA on 10/20/94. Both documents are nearing completion.

NPDES -- This is a government owned, contractor operated (GOCO) facility. DOE and the University of California (UOC) are the permittee. An FFCA has been negotiated with DOE to correct discharge violations at eight separate outfalls and a waste stream characterization study of the laboratory's facilities. A new FFCA has been drafted and is being reviewed for signatures. AO VI-93-0178 was issued to UOC on 5/93 for violations of permit limitations for Total Suspended Solids. Reports ending 12/31/93 indicate that the facility is not complying with its permit limitations for free available chlorine but the reports ending 6/30/94 show the facility to be on schedule with its compliance agreement and AO VI-92-0157 was administratively closed on 5/18/94. AO 94-1051 administratively closed on 11/9/94. The current FFCA is to be revised to incorporate projects already underway at the site. These projects - at outfall 05A and the high explosives outfall - are outlined in AO VI-94-1242, issued June 15, 1994. Work is to be completed by October, 1997

RCRA -- 45 open violations with 33 of them HPV's. 2 TSD class 1 Land Ban (1 HPV) with NON in 10/92 by the State. All other 43 violations were issued by the State. 2 TSD class 1 and 2 (HPV) other violations received a warning letter 7/91. 1 TSD class 1 (HPV) land ban violation received an AO on 3/93. 12 of these are covered by a Final AO issued 12/93; 1 Generator class 1 (HPV) recordkeeping, 2 TSD class 1 and 2 general violations, 2 TSD class 1 (HPV) container violations, 6 Generator class 1 (3 HPV) pre-transport violations and 1 TSD class 1 pollution prevention requirements violation. 28 are covered by a an AO issued 3/95; 24 Generator class 1 (21 HPV) violations, 4 TSD violations, 1 class 1 (HPV) land ban violation, 2 Generator class 1 (HPV) and 1 class 2 other violations.

Los Alamos National Laboratory is currently operating under a RCRA Federal Facility Compliance Agreement issued March 15, 1994 for violations of the RCRA Land Disposal Restrictions (LDR) regarding storage of mixed waste.

8. SANDIA NATIONAL LABORATORIES, NM --

CAA -- Review of the NESHAP annual and inspection reports indicate that this facility is probably in compliance with the emission standard at §61.92 but not in compliance with emission monitoring and test procedures requirements at §61.93. A Plan for achieving compliance with Subpart H has been submitted to EPA and is under review.

9. WHITE SANDS (NASA) TEST FF, NM --

RCRA -- EPA issued a 3008(h) order in 12/89 on a TSD class 1 groundwater HPV violation and the FF remains in compliance with the schedule established in the order.

January 1 - March 31, 1995

10. WHITE SANDS MISSILE RANGE, NM --

RCRA -- The facility was in compliance as of 12/94.

11. EI RENO PRISON, OK --

RCRA -- Six open violations determined by the State received an AO 3/94. 4 TSD class 1 HPV groundwater, landfill/surface impoundment and closure violations; a TSD class 1 general standards violation, and a Generator class 2 small quantity generator violations were covered by the 3/94 AO.

12. FORT SILL, OK --

NPDES -- An FFCA was signed in 7/89. Army granted funds under A-106 plan to initiate study of the alternatives to the MCA project. A new FFCA was developed to reflect the future expansion of the STP and became effective in June, 1991. A revised FFCA became effective June 14, 1993. Recent reports for the 1st quarter of 1995 indicate that the facility has completed their STP expansion project.

13. McALESTER ARMY AMMUNITION PLANT, OK --

NPDES -- McAlester AAP experienced TSS violations 3/95 along with a bypass on 3/13/95.

14. TINKER AIR FORCE BASE, OK --

NPDES -- Representatives from EPA, TAFB and the State met in 10/91 and a new FFCA was issued in 9/92. This FFCA contains both interim effluent limitations and a compliance schedule for the Industrial Waste Treatment Plant (IWTP). IWTP improvements are expected to be complete in 5/95. TAFB violated several interim limits of the FFCA between 10/92 and 6/93. Letters regarding these violations were distributed by EPA in 6/93 and 8/93. Also, TAFB has experienced chronic effluent violations (mostly BOD) at its Sanitary Treatment Plant (STP), Outfall 01S. The STP is not discussed in the FFCA as it was substantially in compliance at the time the FFCA was developed. EPA distributed letters regarding these violations in 9/93, 10/93 and 12/93. TAFB informed EPA that corrective actions are planned and ongoing to achieve compliance at the STP. However, additional BOD, TSS and oil and grease effluent violations occurred at outfall 01S in 4, 5 and 6/94. Recent reports show continued noncompliance for Chemical Oxygen Demand (COD) and Total Copper at outfall 001 for 11/94, also Total Suspended Solids (TSS) at outfall 002 for 10/94.

RCRA -- (UST) --TAFB signed a Federal Facilities Compliance Agreement (FFCA) with EPA Region 6 on September 16, 1994. The FFCA identifies violations concerning underground storage tanks (USTs) and the actions that TAFB has completed to be on schedule with their FFCA to attain compliance with Federal UST regulations.

15. AIR FORCE PLANT #4 (Lockheed, Ft. Worth), TX --

NPDES -- Plant failed to submit a NPDES application (for renewal) within the required time period but is now in compliance. AO VI-92-1174 is closed.

16. BERGSTROM AIR FORCE BASE, TX --

RCRA -- One open TSD class 1 other requirements violation with a verbal warning in 2/93 by the State.

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17. CORPUS CHRISTI NAS, TX --

RCRA -- Five open class 2 and 3 violations determined by the State. 2 class 2 TSD groundwater, 1 class 3 groundwater, and 2 class 3 solid waste violations with warning letters issued 10/93, 2/91, 3/87, and verbal warning in 6/87.

18. DYESS AIR FORCE BASE, TX --

RCRA -- 18 open (1 HPV) violations. The 8 issued by State are: 2 TSD class 1 and 2 other requirements violations with a Final AO 2/88, 1 class 3 solid waste violation with Final AO 2/88. 1 class 2 Generator other, 1 class 3 groundwater violation, 1 class 3 manifest and 1 class 3 groundwater received a 7/94 warning letter. 1 class 3 groundwater violation with verbal warning in 9/88. The 10 referred by State and issued by EPA are: 4 TSD class 1 (1 HPV) other, 1 class 3 permit, 2 class 3 solid waste, 2 TSD class 1 groundwater and 1 Generator class 2 other violations covered by a NON issued 6/92. There are also 19 additional violations under FFCAs that are open.

19. FORT BLISS, TX --

CAA -- NESHAP violations connected with asbestos demolition/removal activities (non-notification, emissions control, worker protection). State has enforcement lead, issued NOV 9/85, and notice of intent to sue 2/86. Case referred to State Attorney General on 4/86 for legal action against Ft. Bliss and two contractors. Both contractors have agreed to \$1,500 penalty. No settlement yet with Ft. Bliss. Additional NOV for similar violation issued 7/87 (no contractor involved) which was added to lawsuit in 11/87. Additional NOV's issued by El Paso City-County Health Dept. for self-reported asbestos violations issued 7/92 and 8/92; these have also been added to lawsuit in 3/93. The local agency issued additional NOV's to the base in 6/93 for handling bags of asbestos without any warning labels and in 9/93 for allegedly demolishing 73 of 124 buildings on Base (which had asbestos transite siding) without notification and not removing the asbestos siding before demolition. The state will refer the new violations to the State AG office. The Attorney General's Office is still keeping open the option to sue Fort Bliss, but has not yet done so.

RCRA -- 15 open violations (1 HPV) determined by the State. 1 TSD class 1 other HPV, 2 Generator class 2 other and land ban, 3 class 3 permit requirements, and 1 solid waste class 3 violation covered by an AO in 12/93. 1 class 3 permit requirements, 2 class 3 solid waste requirements and 5 Generator class 2 other requirements with warning letter in 3/94 and verbal warning in 6/94..

20. FORT HOOD, TX --

RCRA -- Fifteen open violations including six HPVs. The following 5 class 1 HPV violations were covered by an AO issued in 6/93 by EPA: 2 TSD closure, 2 TSD part B application and 1 Generator manifest requirements; The following 7 violations were covered by an AO issued in 10/93 by the State and remanded to a hearing; 2 Generator class 1 manifest and other requirements, 1 TSD class 1 other HPV, 4 class 3 solid waste and manifest requirements. The following 3 violations were covered by a NOV in 4/94 by the State: 2 Generator class 1 other and a class 3 solid waste requirements.

EPA determined that Fort Hood was illegally storing, open-burning, and treating hazardous waste (HW) at their Fire Training Unit. The State also found that Fort Hood was storing used oil containing HW in underground storage tanks at the Post's airfield without a permit. The violations are as follows; storage of HW, thermal treatment of HW and treatment of HW without a permit, failure to manifest HW shipments and amend closure plans. Civil penalties assessed against Ft. Hood totalled \$1,326,750.

21. KELLY AIR FORCE BASE, TX --

RCRA -- Two TSD class 2 closure open violations with a Final AO in 5/89 by State.

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22. LACKLAND AFB TRAINING ANNEX, TX --

RCRA -- Two TSD class 1 thermal treatment and part B application requirements HPV violations with civil action for money penalties issued in 6/93 by EPA.

23. LONE STAR ARMY AMMUNITION PLANT, TX --

RCRA -- One class 3 groundwater violation addressed a warning letter on 2/88. Five Class 3 permit violations addressed with a State AO 1/94.

24. LONGHORN ARMY AMMUNITION PLANT, TX --

RCRA -- 6 open violations determined by the State with NOV issued 11/93 covering the following: 1 each TSD class 1 groundwater, closure, land ban and other requirement violations (4 total); 1 Generator class 3 groundwater and class 3 solid waste violation.

25. RED RIVER ARMY DEPOT, TX --

RCRA -- 16 open violations determined by the State. The following 8 violations were covered by a AO issued in 1/95: 2 TSD class 1 other and land ban, 1 Generator class 1 other, 3 class 3 solid waste, 1 class 3 groundwater and 1 class 3 schedule slippage requirements. 3 solid waste and 3 permit class 3 requirements were issued warning letters 6/88, 10/90, 5/92 and 7/94. Also, 2 Generator class 2 other violations were issued a warning letter 7/94.

26. REESE AIR FORCE BASE, TX --

RCRA -- 3 open violations covered by a AO issued 3/94 by State for 1 class 1 Generator other violation and 2 class 3 solid waste violations. Also, there are 6 additional violations under FFCAs that are shown open in RCRIS for Reese AFB.

In 6/93 EPA issued the first imminent and substantial endangerment order ever issued to a military base - Reese AFB. Approximately 30 residential or other water wells in the area were found to contain trichloroethylene (TCE) in concentrations greater than EPA's maximum contaminant level allowable for drinking water. Other industrial chemicals were also found in the RAFB's offsite monitoring wells. The Texas Natural Resources Conservation Commission (TNRCC) report provided to Reese AFB contained technical recommendations and corrective measures to use to remediate the groundwater contamination.

27. CAMP STANLEY, TX (Significant Minor Facility) --

RCRA -- Two open TSD HPV violations. EPA issued an AO on 2 class 1 violations for closure and thermal treatment requirements in 6/93.

EPA determined that Camp Stanley was operating an open-burning/open detonation unit without a permit. Accordingly, EPA issued a 3008(a) Complaint citing the following violations: Operating a hazardous waste thermal treatment unit without a permit and failure to have facility closure plans. Civil penalties assessed by EPA totalled \$693,000.

28. FORT SAM HOUSTON, TX (Significant Minor Facility) --

TSCA -- EPA issued a NON (a SNC Violation) on 10/26/94 for failure to properly register PCB transformers, failure to maintain proper records, failure to notify EPA of its PCB activity, failure to mark PCB large high voltage capacitors and failure to properly dispose of PCB transformers including two that were leaking.

**MEDIA PROGRAM DEFINITIONS  
FEDERAL FACILITIES  
MAJOR SOURCES AND SIGNIFICANT NON-COMPLIERS (SNC)**

**A. AIR PROGRAM (CAA)**

1. A major source is:

- a. Any source subject to Title III (Air Toxics) of the 1990 Clean Air Act Amendments with the potential to emit 10 TPY of any listed air toxic or 25 TPY of any combination of listed air toxics;
- b. Any source in a nonattainment area with the potential to emit as tabulated:

<u>Pollutant</u>	<u>Type</u>	<u>TPY (Tons per year)</u>
Ozone (as VOC)	Serious	50
	Transport	50
	Severe	25
	Extreme	10
Carbon Monoxide	Serious (due to stationary sources)	50
PM10	Serious	70

- c. Any source with the potential to emit 100 TPY of any air pollutant; or
  - d. Any source subject to the regulations of the Prevention of Significant Deterioration or nonattainment New Source Review programs.
2. A facility is deemed a significant violator if it is:
- a. A major source (as defined above) and it violates one of the following:
    - (1) SIP emission, monitoring or substantial procedural requirements, regardless of pollutant designation status.
    - (2) New Source Performance Standard (NSPS) emission, monitoring, or substantial procedural requirements.
    - (3) NESHAP emission, monitoring or substantial procedural requirements for existing NESHAP standards and promulgated Maximum Available Control Technology (MACT) requirements.
    - (4) SIP, NSPS or NESHAP emission, procedural or monitoring requirements violated repeatedly or chronically.
    - (5) Any provision of a Federal Consent Decree or Federal Administrative Order.
    - (6) Any substantive provision of a State Judicial Order or a State Administrative Order which was issued for an underlying SIP violation.
    - (7) Any requirement of Part C or Part D of Title I of the CAA.

- b. Any synthetic minor source, and it is in violation of any one or more of the following:
  - (1) Avoiding PSD while violating an emission limit or permit condition which affects the PSD status.
  - (2) Exceeding its permitted emission standard above the amount that would classify the source as a nonattainment area major source.

**B. HAZARDOUS WASTE PROGRAM (RCRA)**

- 1. A major source is:

Any source that treats, stores or disposes of hazardous wastes on site (RCRA TSD facility)
- 2. A facility is deemed a significant violator if it is a hazardous waste handling FF whose violations warrant national enforcement program attention and is also determined to be a High Priority Violator (HPV). A HPV (also referred to as SNC) is a hazardous waste handler who:
  - a. Has caused actual exposure, poses threat of exposure, or caused a substantial likelihood of exposure to hazardous waste or hazardous constituents;
  - b. Is a chronic or recalcitrant violator, including handlers who are regularly found to have many Class I or Class II violations;
  - c. Deviates from the terms of a permit, order or decree by not meeting the requirements in a timely manner and/or by failing to perform work as required by terms of regulations or Administrative Orders; or
  - d. Substantially deviates from RCRA statutory or regulatory requirements.

**C. UNDERGROUND STORAGE TANK PROGRAM (RCRA)**

The Office of Underground Storage Tanks (UST) has determined that a facility is a significant violator (SNC) if its UST system:

- 1. Experiences a leak or spill and is not properly reported.
- 2. Experiences a leak or spill that is properly reported, but abatement and/or corrective action is not initiated.
- 3. Has non-existent or inadequate leak detection system.
- 4. Is subjected to improper tank closure.

**D. TSCA PROGRAM (PCB)**

A FF is determined to be a significant violator if it has a major PCB violation. A major violation is one that, for a non-Federal facility, would require issuing an administrative complaint, or equivalent, and the proposed penalty would be \$25,000 or greater.

**E. WATER PROGRAM (NPDES)**

1. A major source is:
  - a. Any municipal point source that discharges at least one million gallons per day (MGD) of wastewater to waters of the United States, or
  - b. Any industrial point source that discharges wastewater to waters of the United States and meets certain criteria related to the potential for toxic pollutants, levels of conventional pollutants, wastewater and stream flow, potential for public health impacts, water quality factors, and other factors of concern.
2. A facility is deemed a significant violator if it is:

Any FF with Category I or Category II non-compliance (as defined in 40 CFR 123.45) required to be reported in the NPDES Quarterly Non-Compliance Report.

**F. WATER PROGRAM (SDWA)**

A public water system meeting any of the following criteria is a significant violator:

1. Microbiological/Turbidity:
  - a. Systems on monthly monitoring:
    - (1) Four or more combined Maximum Contaminant Level (MCL) or major<sup>1</sup> repeat monitoring or reporting (M/R) violations during 12 consecutive months.
    - (2) Six or more combined MCL or major repeat or major routine M/R violations during 12 consecutive months.
    - (3) Ten or more combined MCL or M/R violations (major or minor<sup>2</sup>) during 12 consecutive months.
  - b. Systems on quarterly monitoring: Three or more combined MCL and/or major repeat or major routine M/R violations during four consecutive quarters.
  - c. Systems on annual monitoring: Two or more MCL and/or major repeat or major routine M/R violations during two consecutive years.

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<sup>1</sup>A "major" monitoring/reporting (M/R) violation is one where no samples were taken or results reported during a compliance period.

<sup>2</sup>A "minor" M/R violation is one where an insufficient number of samples were taken or results reported during a compliance period.

2. Chemical/Radiological:

- a. Exceeds the unreasonable risk to health (URTH) level published for identified carcinogens and non-carcinogens and the following contaminants:

<u>Contaminant</u>	<u>URTH Level</u>
Nitrate	10 mg/l
Nitrite	1.0 mg/l

- b. Fails to monitor for or report the results of any of the currently regulated contaminants for two consecutive compliance periods.

3. Surface Water Treatment Rule:

- a. Filtered System: Four or more technique violations in 12 consecutive months or six or more combined technique or M/R violations in 12 consecutive months.
- b. Unfiltered System: Informed to filter by 1/92, but does not by 6/29/93, or informed to filter after 12/91, but does not within 18 months, or three or more major M/R violations in 12 consecutive months.

- 4. Public Notification: Fails to provide notice to consumers of the violations which result in the system becoming SNC.