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ENVIRONMENT DEPARTMENT
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JUDITH M. ESPINOSA
SECRETARY

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DEPUTY SECRETARY



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

October 11, 1991

Mr. Jim Richards, Chief
Environmental Management
Cannon Air Force Base
Headquarters 27th Combat Support Group DEEV
Cannon Air Force Base, New Mexico 87413

RE: Notice of Deficiency
NM 5572124456

Dear Mr. Richards,

The New Mexico Environment Department has completed its administrative review of the Melrose Air Force Range (AFR) permit application for an operating permit under the Resource Conservation and Recovery Act and has found the application to be incomplete. The deficiencies to be addressed are described below and the regulations cited are the New Mexico Hazardous Waste Management Regulations (HWMR-6), Part IX, 40 CFR §270.10(c).

1. Map Requirements 40 CFR §270.14(b)(19) The owner/operator (O/O) must:

Show the terrain for a distance of 1,000 feet outside the AFR property at a map scale of 1 inch equal to not more than 200 feet. Multiple maps may be submitted. Other scales may be used, only if justification is approved by the New Mexico Environment Department (NMED). We are aware that the 1,000 foot requirement has been addressed on a map with scale of 1 inch equal to 2,000 feet. This scale is not acceptable unless adequate justification is presented.

Show locations of separate adjoining properties to the AFR and explain the purpose for which they are used (e.g. rangelands, croplands).

Show the position of all buildings and roads within at least a two mile radius from the OB/OD unit. Include the nearest AFR property boundary.

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Provide calculations and map(s) demonstrating that the OB/OD unit is not located in the 100 year floodplain. Alternate methods approved by the NMED may be used.

2. Traffic Patterns 40 CFR §270.14(b)(10) The O/O must:

Estimate the number and types of vehicles used both in and around the AFR property. If predictable, indicate particular times of the day vehicles are used.

Describe the quantities of waste explosives that are transported from both on and off site locations to the OB/OD unit. In lieu of specific quantities, a range will be sufficient.

Discuss access control at the boundary of the AFR and within the limits of the property boundary.

Regarding traffic control between CAFB and the AFR, there are no maps that identify the intersection of Ranchvale Road and Route 60. Provide a map that shows this information.

Show on an AFR map the routes used to transport waste explosives from both on and off site locations. Discuss composition and maintenance of these roads within the AFR.

3. Waste Analysis 40 CFR §270.14(b)(2); §264.13 The O/O must:

Address details for the inspection of explosive waste shipments from Cannon Air Force Base (CAFB). This must include comparisons between written inventory descriptions and the physical presence of actual waste.

4. Contingency Plan 40 §264.32; §254.52 The O/O must:

Describe procedures and equipment that the fire department will use to treat any anticipated emergency situation. Include the location(s) of where this equipment will be stored. The application states that the CAFB fire department will be 'on site' when waste explosives are being treated.

Specify the present locations of where the current contingency plan has been distributed.

5. Hazard Prevention 40 CFR §270.14(b)(i) The O/O must:

Identify possible transporter loading and unloading hazards for waste explosives collected at both the AFR and the CAFB.

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Please submit the requested information within 30 days of receipt of this letter. Receipt and review of this information is necessary before the application can be considered administratively complete and no permit can be issued unless the application is complete [Pt IX, §270.10(c)]. Failure to send the information within 30 days will result in permit denial.

Upon submission of a complete Part B application and payment of the permit processing fee, technical review will begin. Further information will be required at that time. Should you have further questions, please contact Mr. Tom Tatkin or Dr. Herb Grover at 827-4300.

Sincerely,



Benito J. Garcia
Bureau Chief
Hazardous & Radioactive Materials Bureau

BJG/TT

xx: Richard Mayer, U.S. EPA Region VI
NMED Office of General Counsel