

WSMR2001



GARY E. JOHNSON
GOVERNOR

**State of New Mexico
ENVIRONMENT DEPARTMENT**

**Hazardous Waste Bureau
2044 A Galisteo, P.O. Box 26110
Santa Fe, New Mexico 87502-6110
Telephone (505) 827-1557
Fax (505) 827-1544**



PETER MAGGIORE
SECRETARY

PAUL R. RITZMA
DEPUTY SECRETARY

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

March 22, 2001

Steven W. Flohr
Brigadier General, U.S. Army
Commanding General
U.S. Army White Sands Missile Range
White Sands Missile Range, NM
88002-5048

**RE: NOTICE OF ADMINISTRATIVE COMPLETENESS
RCRA PERMIT APPLICATION – PART A & B
HAZARDOUS WASTE STORAGE FACILITY
WHITE SANDS MISSILE RANGE
EPA ID#NM2750211235**

Dear Brigadier General Flohr:

The Hazardous Waste Bureau (HWB) of the New Mexico Environment Department (NMED) has reviewed the June 21, 1999 White Sands Missile Range (WSMR) RCRA permit application-Part A & B for the hazardous waste storage facility (HWSF). HWB has made a determination that the document is administratively complete.

The New Mexico Hazardous Waste Management Fee Regulations 20 NMAC 4.2 require assessment of fees when administrative review of a document is complete. HWB will issue an invoice to you under a separate letter. Payment is due within sixty (60) calendar days from the date that you receive the invoice.

Should you need to request an extension of the sixty-day period, the request must be received by the New Mexico Environment Department a minimum of fourteen (14) calendar days prior to the end of the sixty-day period. Should you disagree with the fee assessed, you may file an Administrative Appeal under the provisions of 20 NMAC 4.2.302.1.

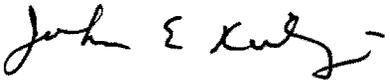
Brigadier General Flohr
March 22, 2001
Page 2 of 2

Upon receipt of the fees, NMED will begin review of the document for technical adequacy and completeness.

Although HWB cannot offer a complete technical review of WSMR's application at this time, we are able to offer some preliminary technical comments for WSMR's consideration in Attachment 1. The Department will provide WSMR with a full technical review as soon as we have received the appropriate fees.

If you have any questions concerning the permit renewal process please contact Robert Warder at the address above or by telephone at (505) 827-1557 ext.1052, or Cheryl Frischkorn at (505) 827-1557 ext. 1042.

Sincerely,



John E. Kieling
Program Manager
Permits Management Program

[WSMR-99-006]

JEK/rw

cc: Thomas A. Ladd, WSMR
James P. Bearzi, NMED HWB
Glenn von Gonten, NMED HWB
Robert S. Dinwiddie, NMED HWB
Cheryl Frischkorn, NMED HWB
Pam Allen, NMED HWB

File: Red WSMR File, Reading File

ATTACHMENT 1

The comments below represent preliminary technical comments for WSMR's consideration.

- 1) Page 3 of 7 of Part A permit application, Section X, part B; please confirm that the permit numbers are the same as the WSMR EPA ID number.
- 2) §264.15 (d), specifying the retention of inspection records, needs to be addressed in the permit application.
- 3) In reference to §264.52 (c), §264.37 needs to be included in the contingency plan.
- 4) The addresses and home phone numbers of all persons listed as emergency coordinators need to be included in the contingency plan per §264.52(d).
- 5) WSMR needs to provide information whether the HWSF installation is located within the boundaries of the 100-year floodplain. This information needs to be furnished on a Federal Insurance Administration flood map or by calculations in accordance with §270.14(11)(iii).
- 6) In accordance with §264.112 (b) (3), an estimate of the maximum inventory of hazardous wastes ever on site needs to be included in the closure plan.
- 7) Topographic map (Plate #7) needs a wind rose in accordance with §270.14 (b) (19) (v).
- 8) § 264.17 (a), (b), and (c) need to be elaborated on in the permit application.
- 9) §264.175 (b) (3) states that the container storage containment system must have sufficient capacity to contain 10% of the volume of containers or the volume of the largest container, whichever is greater. Please provide the volume calculations showing that the sump in Building S22895 will contain 10% volume of containers. This comment also references §270.15 (a) (3).
- 10) Please verify that ignitable and reactive wastes are stored no closer than 50 feet from the facility property lines in accordance with §264.176.