

RED WSMR/2002



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PETER MAGGIORE  
SECRETARY



**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

January 22, 2002

Thomas A. Ladd, Director  
Environment and Safety Directorate  
U.S. Army Whites Sands Missile Range  
White Sands Missile Range, New Mexico 88002-5000

**SUBJECT: REQUEST FOR SUPPLEMENTAL INFORMATION  
RCRA PERMIT APPLICATION FOR THE HAZARDOUS WASTE  
STORAGE FACILITY  
WHITE SANDS MISSILE RANGE  
EPA ID NO. NM2750211235  
HWB-WSMR-99-006**

Dear Mr. Ladd:

On March 22, 2001 the New Mexico Environment Department (NMED) determined that the White Sands Missile Range (WSMR) 1999 RCRA Permit Application for the Hazardous Waste Storage Facility, submitted in June 1999, was administratively complete. On May 16, 2001 NMED confirmed receipt of the fees paid by WSMR on May 10, 2001.

In accordance with 20.4.2.201.3 and 20.1.4 NMAC, NMED has completed its first technical review of WSMR's RCRA Permit Application for the Hazardous Waste Storage Facility and has determined that it is not technically adequate and that changes are necessary before it can be approved. Therefore, NMED is issuing WSMR with this *Request for Supplemental Information* (RSI).

NMED's numbered comments are included as Attachment 1 and constitute our first technical review of WSMR's RCRA Permit Application. Please submit a revised Permit Application or replacement pages within sixty (60) days of receipt of this RSI. In addition, please include a

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response letter that indicates exactly where revisions have been made, cross-referencing NMED's numbered comments.

Following WSMR's submission of a revised Permit Application, NMED will again review the application for technical merit. If it is found to be technically adequate, NMED will then begin drafting WSMR's RCRA Permit. In accordance with 20.4.2.201.3.3 NMAC, NMED shall review the application and issue a Draft Permit or a Notice of Intent to Deny the Permit within one (1) year after the application is deemed administratively complete, excluding time tolled during all periods in which NMED is awaiting a response from the applicant to a Request for Supplemental Information or a Notice of Deficiency. If you have any questions concerning this RSI, please call me at (505) 428-2550.

Sincerely,



Cheryl Frischkorn  
WSMR Project Leader  
Permits Management Program

CAF:caf  
[HWB-WSMR-99-006]

cc: James P. Bearzi, NMED HWB  
John Kieling, NMED HWB  
David Cobrain, NMED HWB  
Glenn von Gonten, NMED HWB  
Julie Jacobs, NMED DSMOA  
Gene Forsythe, WSMR  
Mark Melnyk, WSMR  
David Neleigh, EPA Region 6  
Reading File and ~~WSMR 2001 Red File~~

# ATTACHMENT 1

## ATTACHMENT 1

The following comments comprise NMED's first technical review of WSMR's Permit Application. NMED's advance comments listed in our March 22, 2001 Notice of Administrative completeness letter are reiterated here. As noted above, please provide a written response to each numbered comment as well as revisions to the application.

NMED suggests that WSMR review EPA's guidance (WAP Guidance Manual) on Waste Analysis Plans (USEPA, OSWER 9938.4-03, April 1994; *Waste Analysis At Facilities Than Generate, Treat, Store, And Dispose Of Hazardous Waste - A Guidance Manual*).

We are also attaching the most recent Part A of the Hazardous Waste Permit Application and instructions for completing the form (see Attachment 2).

### COMMENT 1.

NMED recommends that WSMR supply a Table of Contents for the permit application.

### COMMENT 2.

As specified in 20.4.1.900 NMAC, incorporating 40 CFR 270.13(k)(1-9), please include in Part A of the permit application all the permits and/or construction approvals received or applied for under any of the programs listed in this section.

### COMMENT 3.

Please provide a scale on the facility drawing located in Section XVI in Part A of the permit application.

### COMMENT 4.

As specified in 20.4.1.500 NMAC, incorporating 40 CFR 264.15(d), the permit application must state that the owner/operator must retain the inspection records for at least three years after the inspection. Please include this in your permit application.

### COMMENT 5.

Section 2.4 of the Permit Application states the WSMR will characterize wastes in accordance with appropriate QA/QC procedures. Please describe in detail appropriate QA/QC procedures to be conducted for the purpose of characterizing wastes in WSMR's Waste Analysis Plan (WAP) (Section 2.0). Refer to section 2.3.5 of the EPA's WAP guidance mentioned above.

**COMMENT 6.**

Please specify waste sampling strategies and equipment to be used for wastes generated at WSMR. Include the type of sampling containers, sample preservatives, shipping procedures, sample labeling, grab vs. composite samples, and sample documentation. Again, please refer to Section 2.3 of EPA's WAP guidance.

**COMMENT 7.**

Please state in Section 2.0 that the WAP will be periodically reviewed to ensure the plan is compliant with current regulations and facility wastes streams.

**COMMENT 8.**

Section 2 of the Permit Application does not specify how new or non-routine wastes will be handled. Please include in the WAP a section describing how new and non-routine waste streams will be handled.

**COMMENT 9.**

Include in the WAP a section describing recordkeeping procedures that are compliant with 20.4.1.300 NMAC and 20.4.1.500 NMAC, incorporating 40 CFR 262.40 and 40 CFR 264.73, respectively.

**COMMENT 10.**

Include all the information specified in 20.4.1.500 NMAC, incorporating 40 CFR 264.37 (Arrangements with Local Authorities) in the contingency plan.

**COMMENT 11.**

Table 5-1 (page 39 of Section 5) must be revised to include the list of names, address, and phone numbers (both office and home) of all persons qualified to act as emergency coordinator, as specified in 20.4.1.500 NMAC, incorporating 40 CFR 264.52(d). Please note that WSMR must update this list appropriately.

**COMMENT 12.**

Please change the citation 40 CFR 264.18(d) to 40 CFR 264.18(a) (page 57, Section 9).

**COMMENT 13.**

As specified in 20.4.1.900 NMAC, incorporating 40 CFR 270.14(11)(iii), the owner and operator of all facilities shall provide an identification of whether the facility is located within a 100-year floodplain. WSMR must also identify the source of the data for this determination.

**COMMENT 14.**

In Section 12 (Closure Plan) please provide an estimate of the maximum inventory of hazardous wastes ever on-site over the active life of the facility, as specified in 20.1.4.500 NMAC, incorporating 40 CFR 264.112(b)(3).

**COMMENT 15.**

In Section 12 (Closure Plan), please specify the off-site licensed disposal facility currently under contract with WSMR, where WSMR indicates that all the remaining containers of hazardous waste will be sent during closure of the container storage area.

**COMMENT 16.**

In Section 12.1, WSMR indicated that the areas used for storage of hazardous waste will be divided into 100 equal-sized units and 15 percent of the units will randomly sampled and analyzed.

However, it is unclear what will be sampled and analyzed (metal, concrete, soil?). Please revise this section to provide additional explanation/description on what will actually be sampled and analyzed and what methods will be utilized to accomplish this task.

**COMMENT 17.**

In Section 12, please specify what actions will be taken by WSMR if soil contamination is confirmed.

**COMMENT 18.**

Table 17-1 of Section 17 must list all Solid Waste Management Units (SWMUs) at WSMR. SWMUs not listed in Table 17-1 include: 17, 38, 39, 41-46, and 57. Please review this table and make appropriate changes.