



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 6  
1201 ELM STREET, SUITE 500  
DALLAS, TEXAS 75270

February 24, 2023

Mr. Dave Cobrain, Program Manager  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East Building 1  
Santa Fe, New Mexico 87505

RE: Review of the Resource Conservation and Recovery Act (RCRA) Permit Application for: White Sands Missile Range- Operating and Post-Closure Care Permit, Doña Ana, Lincoln, Otero, Sierra, and Socorro Counties, NM Permit # NM 2750 211 235, EPA ID # NM2750211235

Dear Mr. Cobrain:

As part of the EPA's oversight for hazardous waste permitting, the EPA Region 6 reviews and provides feedback on permit renewal applications submitted to the states, including the State of New Mexico. The EPA Region 6 conducts completeness reviews, which could include reviews of permit conditions, types of units, closure/post-closure requirement, compliance monitoring and corrective action, financial assurance requirements, and verification that consistent information is entered in the RCRA Info database. We have completed our review of the permit renewal application for the facility referenced above. On a conference call on February 10, 2023, we discussed the review items with you and Mr. Robert Murphy, and they are included in the enclosed review checklist.

EPA is committed to integrating environmental justice into the permitting process, including full and meaningful public participation opportunities for overburdened communities. Some of the ways to ensure meaningful participation include early engagement, direct communication with vulnerable communities and other target audiences, and public notice and outreach at public places in neighborhoods.

If you have any questions regarding this letter, please contact Dr. Amber Garcia Arañoz of my staff at (214) 665-2179.

Sincerely,

2/24/2023

X *Harry Shah*

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Harry Shah  
Section Supervisor  
Signed by: HRUSHIKESH SHAH

RCRA Permits and Solid Waste Section  
Land, Chemicals and Redevelopment Division

Enclosure

cc: Melissa Smith, LCR-R

**White Sands Missile Range, U.S. Hwy 70, White Sands Missile Range, Doña Ana, Lincoln, Otero, Sierra, and Socorro Counties NM, EPA ID NM2750211235, Permit # NM 2750 211 235, Draft Permit and Application Dated December 2022.**

| Performance Standards   | Notes  |
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| <p>1. Permit conditions are consistent with the authorized state program and the intent of the regulations regarding level of control, containment, cleanup or protection.</p>  | <p>The NMED is authorized to implement the permitting program, and the permit includes conditions consistent with the authorized state program. This review is based on the draft permit and renewal application dated December 2022. The facility has one hazardous waste container storage area, has at least one SWMU under post-closure care, and have several SWMUs that require corrective action prior to closure under the White Sands Missile Range’s Permit. The most recent permit renewal was on 01/08/2010.</p> <p>When running the EJ Screen tool for the 1-, 3-, and 5-mile evaluations: at all three radial measurements around the White Sands Missile Range Facility, at least one EJ index exceed the 80<sup>th</sup> percentile.</p> |
| <p>2. Permit conditions are clear, understandable and enforceable. Feed stream analysis plan (FAP) complies with CAA. All operating parameters limits (e.g., maximum feed rates, minimum temperatures in the combustor, and associated air pollution control devices) are in accordance with operating parameter limits in NOC.</p> | <p>The attachment shows inconsistencies identified during the review. These were communicated to the NMED during the 02/10/2023 conference call. The State will address these issues appropriately.</p> <p>White Sands Missile Range does not contain any combustion units. Therefore, the Feed Stream Analysis Plan, the operating parameter limits, and the air pollution control devices do not apply.</p>  |
| <p>3. AA/BB/CC requirements: All associated equipment/unit(s) are complying with RCRA/CAA requirements, exemptions, or elections.</p>   | <p>Subpart AA and Subpart BB requirements do not apply to White Sands Missile Range. The facility needs to directly address Subpart CC regulations.</p>  |
| <p>4. Proper documentation and an administrative record are maintained. For the combustion units: the most recent notice of compliance (NOC) and finding of compliance (FOC) based on the latest comprehensive performance test (CPT) and latest RCRA/Air permit with the OPLs.</p>   | <p>The following administrative records are maintained and available:</p> <ul style="list-style-type: none"> <li>• Draft Permit– December 2022</li> <li>• Part A and B–December 2022</li> <li>• Draft Permit (old version)- 08/21/2020</li> <li>• Part A and Part B (old version)- 08/21/2020</li> <li>• Administrative NOD (10/26/2019), response (08/23/2020)</li> </ul> <p>A 120-day time extension request was approved by the NMED to submit the Administrative NOD response on 08/23/2020. Please note that there is no</p>  |

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|  | <p>Technical NOD. Combustion unit documentation does not apply.</p>   |
| <p>5. Controls address: owner/operator requirements for monitoring, reporting, inspections and analyses after permit issuance. Identify the tables and locations. Consistency check in the monitoring wells.</p> | <p>Three post-closure care plans were provided in the permit documents: Rhodes Canyon Landfill SWMU 114 and 115, SWMU 82, Former Sewage Treatment Plant (STP) Percolation Ditches, SWMU 57, Tula Peak Burial Sites.</p> <p>Rhodes Canyon Landfill SWMU 114 and 115, has annual GW monitoring and semi-annual inspections (Introduction, Page 188 of 209). GW analysis is conducted for VOCs, SVOCs, gasoline range organics, total lead, sulfate, alkalinity, water level, and TDS, from one upgradient and three downgradient monitoring wells (Groundwater Monitoring, Page 189 of 209). The results of GW analysis are reported to the NMED on an annual basis (Reporting, Page 190 of 209).</p> <p>SWMU 82, Former Sewage Treatment Plant (STP) Percolation Ditches has annual GW monitoring, but no inspections (Groundwater Monitoring, 197 of 209). According to the NMED, soil remediation was previously completed for the percolation ditches. Therefore, site inspections and security measures are not needed. Corrective action is needed in the GW. GW monitoring parameters are specified in Table 1 Groundwater Monitoring Analytical Program (Reporting, Page 199 of 209). The GW monitoring network consists of 35 wells. GW that exceeds the EPA's 0.2 mg/l MCL for cyanide exists due to previous site activities. The RCRA Investigation is on-going. Eleven additional groundwater monitoring wells will be added to further define the plume boundary. The new wells will be sampled for eight quarters. A RCRA Investigation Report will be submitted to the NMED within 180 days of initial round of sampling of the new wells and the annual report of GW analysis will be submitted to the NMED annually (Reporting, Page 198 of 209).</p> <p>SWMU 57, Tula Peak Burial Sites has annual site inspections and semi-annual GW monitoring (Introduction, Page 202 of 209). GW analysis is conducted for explosives, dissolved metals, and NM</p> |

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|  | <p>water quality cations and anions. Perchlorate was recently discovered in the site’s four wells. (Background, Page 202 of 209). According to the NMED, the only chemical of concern is perchlorate. Currently, the concentration of perchlorate is below screening and regulatory levels. Therefore, GW monitoring will continue to determine whether the perchlorate plume concentration is increasing or decreasing. If perchlorate concentrations increase, then additional wells will be installed to define the plume boundary. Please provide a detailed list of dissolved metals and contaminants that are monitored, as well as the analytical methods used. GW monitoring results will be submitted to the NMED on an annual basis (Reporting, Page (204 of 209)).</p> <p>All page numbers referenced are in the PDF document “White Sands Missile Range Draft RCRA Permit Complete December 2022(004).”</p>                |
| <p>6. Controls address: enforceability and compliance schedules.</p>   | <p>For Rhodes Canyon Landfill SWMU 114 and 115, enforceability and compliance are established under the Revised CMI Work Plan (Background, Page 188 of 209).</p> <p>The SWMU 82, Former Sewage Treatment Plant (STP) Percolation Ditches currently have no controls in place, due to working on plume definition. The facility determined to install additional monitoring wells to define the boundary of the plume to best address the exceedance of the EPA MCL 0.2 mg/l of cyanide and other contaminants in the GW (Background, Page 194 of 209 and Monitoring Well Drilling, Design, and Construction, Page 195 of 209).</p> <p>SWMU 57, Tula Peak Burial Sites does not have controls in place due to perchlorate and other contaminants being below screening and regulatory levels.</p> <p>All page numbers referenced are in the PDF document “White Sands Missile Range Draft RCRA Permit Complete December 2022(004).”</p> |
| <p>7. Controls address: cleanup levels in adequate detail and mechanisms for measuring achievement of post-closure and operating performance standards. Identify the tables.</p> | <p>For Rhodes Canyon Landfill SWMU 114 and 115, the cleanup levels and post-closure care and operating</p>   |

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|  | <p>performance standards are specified in the Revised CMI Work Plan (Background, Page 188 of 209).</p> <p>The SWMU 82, Former Sewage Treatment Plant (STP) Percolation Ditches clean-up levels are defined in Table 1 Groundwater Monitoring Analytical Program. After additional well installation and plume definition, remediation remedies can be evaluated, selected, implemented, and measured. (Background, Page 194 of 209 and Monitoring, Well Design, and Construction, Page 195 of 209).</p> <p>SWMU 57, Tula Peak Burial Sites clean up levels of the unexploded ordnance (UXO) MPPEH involve conducting annual site inspections with UXO technicians to identify any exposed MPPEH and coordinating with the WSMR Explosive Ordnance Disposal Team for removal and disposal (Introduction, Page 203 of 209). Perchlorate concentrations do not exceed screening and regulatory levels. If the perchlorate concentration increases, then the NMED may require a work plan, and additional monitoring that will include the installation of additional monitoring wells for plume definition (Groundwater Monitoring, Page 204 of 209).</p> |
| <p>8. Controls address: soil and groundwater monitoring review. Check on supporting documents. Technical findings.</p> | <p>Rhodes Canyon Landfill SWMU 114 and 115. Review of all post-closure inspection and monitoring activities will be reviewed on an annual basis (Regulatory Requirements, Page 188 of 209)</p> <p>SWMU 82, Former Sewage Treatment Plant (STP) Percolation Ditches. A frequent monitoring report will be submitted annually to the NMED and a 5-year comprehensive periodic review will be conducted to evaluate the effectiveness of the sampling and monitoring program (Reporting, Page 198 of 202).</p> <p>SWMU 57, Tula Peak Burial Sites. Post-closure Care activities will be reviewed on an annual basis (Regulatory Requirements, Page 203 of 209).</p>   |

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| <p>9. Review of cost estimates include each combustion unit and APCDs. Financial assurance instruments accurately reflect closure, post-closure costs and corrective action costs are sufficient to cover cost estimates.</p> | <p>According to 40 CFR 264.140(c), states and the federal government are exempt from cost-estimate and financial assurance requirements. Therefore, White Sands Missile Range is not required to provide documents for a cost-estimate and financial assurance, since it is a Department of Defense federal facility.</p> <p>Combustion units do not apply at White Sands Missile Range.</p>  |
| <p>10. Public participation requirements are met, e.g., public notices with the dates, public library information.</p>  | <p>The permit followed the public participation process. Several public notices have been published regarding the SMWUs at White Sands Missile Range during the permit term. Information on the most recent public notice is shown below.</p> <p>New Mexico Environment Department Hazardous Waste Bureau Sante Fe, New Mexico April 2, 2021, Notice of Public Comment Period And Opportunity To Request A Public Hearing On Determination Of Corrective Action Complete Without Controls At Five Solid Waste Management Units At White Sands Missile Range, New Mexico, EPA ID No. NM2750211235 was published on 07/05/2020. The copy of permit application is available for review at NMED-Hazardous Waste Bureau, 2905 Rodeo Park Drive East, Building 1, Sante Fe, New Mexico 87505-6313. An additional copy was made available for review at the NMED website at <a href="http://www.nmenv.state.nm.us/HWB/wsmrperm.html">www.nmenv.state.nm.us/HWB/wsmrperm.html</a>.</p> |
| <p>11. Describe the permitted units, including general information on capacity. Verify that all units described in the application are included in the permit.</p>  | <p>The facility units specified in the permit are shown below.</p> <ul style="list-style-type: none"> <li>• Hazardous Waste Storage Facility (HWSF): 13,200-gallons</li> <li>• Rhodes Canyon Landfill SWMU 114 and 115: 13-acres</li> <li>• SWMU 82, Former Sewage Treatment Plant (STP) Percolation Ditches: 1,500 and 1,700 ft in length</li> <li>• SWMU 57, Tula Peak Burial Sites: 12-acres</li> </ul> <p>White Sands Missile Range is a U.S. Army federal facility that test and provide missile development programs for the Navy, Army, Air Force, foreign allies, and government agencies. White Sands Missile Range is located in Doña Ana, Socorro, Lincoln, Otero, and Sierra Counties, New Mexico. The facility</p>   |

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|   | <p>spans approximately 3,200 square miles. The HWSF unit is in operation. The Rhodes Canyon Landfill SWMU 114 and 115, the SWMU 82, Former Sewage Treatment Plant (STP) Percolation Ditches, and the SWMU 57, Tula Peak Burial Sites are under post-closure care. In addition, there are several SWMUs that require corrective action prior to closure.</p> |
| <p>12. Verify RCRA Info data is up to date.</p> | <p>Please see attachment.</p>   |

## **EPA Comments for White Sands Missile Range – Operating, Post-Closure Care, and Corrective Action Permit**

### Facility Description

1. December 2022 Part B-Please provide a Part B certification as required in 40 CFR 270.11.

### Process Information-Containers

1. December 2022 Part B Section 2.11 Container Storage Procedures (Page 132 of 209)- Please provide a design drawing of the container storage layout, a description of the containers, and the stacking height of the drums in the HWSF. Also, please describe the number, sizes, and specification of the containers at the HWSF. Not much information is provided in the Part B application to gain a better understanding of how containers are stored and managed in the HWSF.
2. December 2022 Part B Section 2.13 Spill Containment (Page 133 of 209)- No total quantity and sizes of storage containers is provided for the Building S22895. Therefore, there is no way to calculate if the building provides sufficient secondary containment capacity as specified in 40 CFR 264.175(b)(3). Please provide the total quantity of containers, container sizes, and provide calculations to verify that sufficient secondary containment in the building S22895 is provided.
3. December 2022 Part B Section 2. Spill Containment (Page 133 of 209)- Please provide information on how the secondary containment system is designed to remove standing liquids as specified in 40 CFR 264.175(b)(2). Is the base of the secondary containment system sloped to allow for drainage? Does standing liquid drain into a sump? No information is provided on this.

### Prevention and Preparedness/Procedures to Prevent Hazards

1. December 2022 Part B Section 2.13 Spill Containment (Page 133 of 209)- No information is provided to address the prevention of run-off from the HWSF. There is only information on procedures to prevent run-on (Page 133, Section 2.13). Please provide procedures that will be used to prevent run-off from the HWSF as specified in 40 CFR 270.14(b)(8)(ii).
2. December 2022 Part B Section 2.11 Container Storage Procedures (Page 132 of 209)- No information is provided to prevent contamination of personnel to the hazardous waste during normal work operations. Please provide procedures that will be used prevent undue exposure of personnel to hazardous waste as specified in 40 CFR 270.14(b)(8)(v). PPE information is only provided for emergency operations (Page 154).
3. December 2022 Part B Section 2.11 Container Storage Procedures (Page 133 of 209)- No information is provided on separating incompatible wastes at the HWSF by a dike, berm, or wall as specified in 40 CFR 264.177(c). Please provide language that addresses this regulatory citation.
4. December 2022 Part B Section 2.15 Precautions and Emergency Preparedness (Page 134 of 209)- Please provide language that ensures that when hazardous waste is being poured, mixed, spread,



or otherwise handled, all personnel involved in the operation will have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee as specified in 40 CFR 264.34(a). It is not clear in the text.

5. December 2022 Part B Section 2.15 Precautions and Emergency Preparedness (Page 134 of 209)- No procedures and information is provided to address equipment failure and power outages. Please provide information on how equipment and power failures will be addressed as specified in 40 CFR 270.14(b)(8)(iv).

### Contingency Plan

1. December 2022 Part B Section 4.4 Schedule, Emergency Response Procedures, and Notification (Page 152 of 209)- Please include a statement that indicates that the emergency coordinators/ incident commanders have the authority to commit resources to address an emergency as specified in 40 CFR 264.55. This section states that the WSMR Emergency Operations Center Agency has the authority to commit resources, but not an emergency coordinator/incident commander. If an agency has the authority to commit resources, then this could cause confusion and a delay in response during an emergency response due to several people having the authority to commit resources. There needs to be a single person designated as the primary and alternate coordinators that **have** the authority to commit resources.
2. December 2022 Part B Section 4.11 Emergency Response Implementation of the Contingency Plan (Page 155 of 209)- In all of the response procedures, there is no step to activate internal alarm systems to notify personnel of an emergency. Please elaborate on how the alarms or voice/hand signals will be activated and who will have access to activate these systems. No information is provided on this.
3. Please provide a separate section within the Contingency Plan to elaborate on the types of internal alarms and how communication systems will be activated as specified in 40 CFR 264.56(a). Page 134 has some information but does not provide enough information.
4. December 2022 Part B Section 4.23 Emergency Equipment (Page 159 of 209)- No fire extinguishing equipment and internal and external communications and alarm systems are included in the list of emergency equipment as specified in 40 CFR 264.52(e). How are these items checked and fitted for use after an emergency? Please add these items in the list of emergency equipment. (P.134)
5. December 2022 Part B Section 4.24 Arrangements with Local Authorities (Page 160 of 209)- It is highly recommended to have signed agreements in place with the local authorities to coordinate emergency services in the event there is a major catastrophic emergency at the facility that the White Sands Missile Range can't handle. (40 CFR 264.52(c)).
6. December 2022 Part B Section 4.20 Evacuation Plan (Page 158 of Page 209)- Please provide evacuation maps Fig 4-1, Fig 4-2, and Fig 4-3 of the primary and secondary evacuation routes for the HWSF in the most current Part B document. These figures are provided in the 8-21-2020 Part B submittal, but not in the most current Part B submittal (40 CFR 264.52(f)).

7. December 2022 Part B Section 4.8 HAZMAT Incident Site Operations and Field Teams, Assess the situation (Page 153 of 209)- Please add in language that indicates that direct and indirect effects will be used to determine potential effects to human health and the environment as specified in 40 CFR 264.56(c). The contingency plan does not indicate whether indirect and direct effects of a release, fire, or explosion are assessed.

### WAP

1. December 2022 Part B Section 3.0 Waste Analysis Plan (Page 138 of 209)- Per for 40 CFR 264.13(b)(2) the facility's WAP "must specify the test methods which will be used to test" for the parameters identified by the facility to accurately treat, store, or dispose of all generated wastes. While Table 3.1 in the WAP (pdf pgs. 140 – 142 of 209) and section 3.4 of the WAP (pdf pgs. 143 – 144 of 209) describe the parameters and rationale for which different waste streams generated at the facility will be analyzed, the WAP does not detail the specific test methods, as required.
2. December 2022 Part B Section 3.5.4.2 Contamination Control (Page 148 of 209)- When discussing "Contamination Control", the plan states that "sampling tools and equipment will be protected from contamination sources prior to sampling and will be decontaminated before and between samples, if reused." It is recommended that the facility provide more detail and specify what procedures will be used to prevent contamination and decon equipment.
3. December 2022 Part B Section 3.4.2.1 Ignitable, Reactive and Incompatible Wastes (Page 144 of 209)- Per 40 CFR 264.13(b)(6) and 264.17, the facility's WAP must specify the methods that will be used to meet the waste analysis requirements for ignitable, reactive, or incompatible wastes. While this section discusses these types of wastes, it is recommended that the WAP better detail the specific parameters, test methods, and procedures used to manage ignitable, reactive, and incompatible wastes.

Additionally, the above referenced section of the WAP states the waste analysis approach for determining characteristics of ignitable, reactive, and incompatible wastes is "outlined in Section 2.2 of this permit application" (pdf pg. 145 of 209). However, the referenced section does not appear to be correct and should be corrected.

Lastly, the above referenced section of the WAP states that "the procedures for properly handling ignitable, reactive, and incompatible waste at the HWSF" are outlined in Part 3 of the permit (pdf pg. 145 of 209). However, Section 3.9.2 of Part 3 in the August 2020 resubmittal permit application states the Permittee "shall follow the procedures specified in their Waste Analysis Plan" (pdf pg. 46 of 215). It is again recommended to clearly detail how ignitable, reactive, and incompatible wastes will be managed at the facility.

### Training Plan

1. December 2022 Part B Section 5. Training Plan (Page 162 of 209)- No information is provided in the training plan that indicates that a facility person conducts an annual review of the initial training program. Please add in information that an annual review of the initial training occurs as specified in 40 CFR 264.16(c).

2. December 2022 Part B Section 5.2.1 Job Title: Hazardous Waste Program Manager (Page 162 of 209)- No information is provided to indicate if the Hazardous Waste Program Manager, who implements the hazardous waste management training program, is trained in hazardous waste management procedures as specified in 40 CFR 264.16(a)(2). Please ensure that the Hazardous Waste Program Manager is trained in hazardous waste management procedures.
3. December 2022 Part B Section 5.6 Training Records (Page 163 of 209)- Please add in language that ensures training records for current employees will be kept until closure of the facility as specified in 40 CFR 264.16(e). This section provides the retention time of former employee records.

#### Post-Closure Care Plan: Rhodes Canyon Landfill Solid Waste Management Units 114 and 115

1. December 2022 Part B Post-Closure Care Plan: Rhodes Canyon Landfill Solid Waste Management Units 114 and 115 Site Inspections and Maintenance (Page 189 of 209)- Please provide an inspection schedule/checklist for this post-closure care site as specified in 40 CFR 270.28 and 40 CFR 270.14(b)(5).
2. December 2022 Part B Post-Closure Care Plan: Rhodes Canyon Landfill Solid Waste Management Units 114 and 115 Site Inspections and Maintenance (Page 189 of 209)- It is highly recommended to conduct inspections after major storm events, in addition to the semi-annual inspections. Therefore, in the event the cap is damaged after a major storm event, the cap will be fixed in a timely manner instead of waiting for the next semi-annual inspection.

#### Post-Closure Care Plan: SWMU 82, Former Sewage Treatment Plant (STP) Percolation Ditches

1. December 2022 Part B Post-Closure Care Plan: SWMU 82, Former Sewage Treatment Plant (STP) Percolation Ditches Background (Page 195 of 209)- Please provide the flowrate of the groundwater as specified in 40 CFR 270.14(c).
2. December 2022 Part B Post-Closure Care Plan: SWMU 82, Former Sewage Treatment Plant (STP) Percolation Ditches Table 1 Groundwater Monitoring Analytical Program, Ions by Laboratory Analysis (199 of 209)- Please elaborate on where EPA Methods EPA 300.0, EPA 365.3, and EPA 353.2 came from. These methods are not shown in SW-846. Also, please elaborate on what is method OIA-1677-0, under Cyanide by Laboratory Analysis, for free cyanide.
3. December 2022 Part B Post-Closure Care Plan: SWMU 82, Former Sewage Treatment Plant (STP) Percolation Ditches Table 1 Groundwater Monitoring Analytical Program, Totals Metals by Laboratory Analysis (199 of 209)- Please provide the most updated version for EPA Methods 6010C/6020A. The most current methods are 6010D and 6020B, respectively, or place a notation at the bottom of the table that the most current EPA versions will be used.

#### Post-Closure Care Plan: SWMU 57, Tula Peak Burial Sites

1. December 2022 Part B Post-Closure Care Plan: SWMU 57: Tula Peak Burial Sites Introduction (Page 202 of 209)- It is recommended to conduct the site inspections after significant storm

events, since it is possible for MPPEH to be exposed and to present an explosion hazard after significant storm events.

2. December 2022 Part B Post-Closure Care Plan: SWMU 57: Tula Peak Burial Sites Introduction (Page 202 of 209)- It is recommended to conduct inspections for MPPEH on a quarterly or monthly basis, due to wind erosion and the dangers associated with exposed unexploded MPPEH.
3. December 2022 Part B Post-Closure Care Plan: SWMU 57: Tula Peak Burial Sites Groundwater Monitoring (Page 204 of 209)- Please provide a table of existing groundwater monitoring wells and their existing and proposed materials of construction like Table 1. Monitoring Well Information that was completed for the Rhodes Canyon Landfill Solid Waste Management Units 114 and 115, for consistency.
4. December 2022 Part B Post-Closure Care Plan: SWMU 57: Tula Peak Burial Sites Groundwater Monitoring (Page 204 of 209)- Please provide the flowrate of the groundwater as specified in 40 CFR 270.14(c).
5. December 2022 Part B Post-Closure Care Plan: SWMU 57: Tula Peak Burial Sites Groundwater Monitoring (Page 204 of 209)- Please provide a detailed list of dissolved metals and contaminants that are monitored, as well as the analytical methods used.

#### All Post-Closure Plans

1. All post-closure plans- Please ensure that a certificate of closure has been received for all closed SWMUs and that a survey plat has been filed as specified in 40 CFR 264.115 and 40 CFR 264.116.
2. All post-closure plans- Please provide documentation that the notices required under 40 CFR 264.119 have been filed. No documentation has been provided on this.

#### Permit

1. December 2022 Part B Permit Section 1.12.9.6 Reporting anticipated noncompliance (Page 25 of 209)- Is it possible the word “notice” is missing between the words, “advance” and “to?”
2. December 2022 Part B Permit Section 2.6 Characterization of Air Emissions from Containers (Page 34 of 209)- No information has been provided in the White Sands Missile Range permit documents of the container quantity, containers’ construction specifications, and sizes to validate if the information meets the requirements of 40 CFR 264.1086(b).

#### Air Emissions

1. December 2022 Part B Section 2.11 Container Storage Procedures (Page 133 of 209)- No information has been provided on container sizes, if stabilization occurs in them, and what level air emission controls the containers in the HWSF operate under. Please provide this information to verify compliance with 40 CFR 264 Subpart CC regulations.

### RCRA Info

1. Please verify if the CON STOR1 is the same unit as the HWSF, the container storage area, shown in the permit. If so, please change the capacity of the unit in RCRA Info to reflect the permit capacity of 13,200 gallons. It is recommended to have the unit names the same in the permit and in RCRA Info.
2. Please update the capacity of the SWMUs 114/115 Rhodes Canyon to 13 acres. December Part B (Page 188 of 209) designates the capacity as 13 acres, not 12 acres.
3. Please update the legal operating status and the capacity of the SWMU 82 STP Ditches after the post-closure plan is approved.
4. Please add the post closure care unit SWMU 57 Tula Peak Burial Sites and the capacity in RCRA Info.
5. OB/OD Unit (SWMUs 55, 56, and 56A)- Please adjust the capacity in RCRA Info to reflect the post-closure care status of the unit. The current capacity is 1700 (J) pounds per hour.

### Corrective Action

1. December 2022 Part B Table 8-3 SWMUs & AOCs Corrective Action Complete With Controls (Page 179 of 209)- It is recommended for White Sands Missile Range to investigate options on pursuing alternate/more flexible clean-up requirements for soil remediation by completing corrective action of SWMUs and AOCs with institutional controls. This would provide flexible soil clean-up standards and could possibly expedite the closure process.
2. December 2022 Part B Section 8.1 Corrective Action Unit Identification (Page 173 of 209)- Please elaborate on the descriptions and the status of SWMUs 51, 52, 53, and 54. No information is provided in Tables 8-1, 8-2, 8-3, and 8-4, and 8-5. Also, no SWMU summary information is provided in Section 8.1.1 and 8.1.2 of the 8-21-2020 renewal application. (Tables are almost identical on old and new versions, except for AOC information)
3. December 2022 Part B Section 8.1 Corrective Action Unit Identification (Page 173 of 209)- Please elaborate on the descriptions and the status of SWMUs 169-196. No information is provided in Tables 8-1, 8-2, 8-3, and 8-4, and 8-5. Also, no SWMU summary information is provided in Section 8.1.1 and 8.1.2 of the 8-21-2020 RCRA renewal application.
4. December 2022 Part B Section 8.1 Corrective Action Unit Identification (Page 173 of 209)- SWMUs 213-220 are omitted from Tables 8-1, 8-2, 8-3, and 8-4, and 8-5. These SWMUs are shown in the 08-21-2020 RCRA renewal application. Please add these SWMUs to the appropriate tables in the White Sands Missile Range Draft Permit Document.
5. December 2022 Part B Section 8.1 Corrective Action Unit Identification (Page 173 of 209)- No SWMU summary has been provided for SWMU 220 (08-21-2020 RCRA renewal application), as well as, no information is provided in the December 2022 Part B document. Please add in the SWMU 220 summary.

6. December 2022 Part B Section 8.1 Corrective Action Unit Identification (Page 173 of 209)- AOC R is omitted in Tables 8-1, 8-2, 8-3, and 8-4, and 8-5. AOC R is not shown in the 08-21-2020 RCRA renewal application. Please add AOC R to the appropriate tables in the White Sands Missile Range Draft Permit Document. Also, please provide a summary description of AOC R.
7. December 2022 Part B Section 8.1 Corrective Action Unit Identification (Page 173 of 209)- AOCs AA-AC are omitted in Tables 8-1, 8-2, 8-3, and 8-4, and 8-5. AOCs AA-AC are shown in the 08-21-2020 RCRA renewal application. Please add AOCs AA-AC to the appropriate tables in the White Sands Missile Range Draft Permit Document.
8. Please ensure that all SWMU & AOC descriptions are current.