

FB 2002

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PERMIT NO. HW-50296-000  
EPA ID. NO. TX4213720101  
ISWR NO. 63003

Texas Natural Resource  
Conservation Commission  
Austin, Texas



PERMIT FOR INDUSTRIAL SOLID  
WASTE MANAGEMENT SITE issued  
under provisions of TEXAS HEALTH AND  
SAFETY CODE ANN.  
Chapter 361 (Vernon)

Name of Permittee: U.S. Army Air Defense Artillery Center and Fort Bliss  
Directorate of the Environment, Bldg 624  
El Paso, Texas 79916-0058

Site Owner: U.S. Army Air Defense Artillery Center and Fort Bliss  
Directorate of the Environment, Bldg 624  
El Paso, Texas 79916-0058

Classification of Site: Hazardous, industrial solid waste storage on-site, noncommercial

The permittee is authorized to manage wastes in accordance with the limitations, requirements, and other conditions set forth herein. This permit is granted subject to the rules of the Commission and other Orders of the Commission, and laws of the State of Texas. This permit does not exempt the permittee from compliance with the Texas Clean Air Act. This permit will be valid until canceled, amended, modified or revoked by the Commission, except that the authorization to store wastes shall expire midnight, 10 years after the date of renewal permit approval. The permit was originally issued on January 17, 1991.

All provisions in this permit stem from State and/or Federal authority. Those provisions marked with an asterisk (\*) stem from Federal authority and will implement the applicable requirements of HSWA for which the Texas Natural Resource Conservation Commission has not been authorized. Those provisions marked with a double asterisk (\*\*) stem from federal authority only.

ISSUED: **MAR 11 2002**

  
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For The Commission

**PERMIT TABLE OF CONTENTS**

|   | <b>Page</b> |
|---|-------------|
| <u>PERMIT SECTION I. - FACILITY DESCRIPTION</u> .....         | 4           |
| A. <u>SIZE AND LOCATION OF SITE</u> .....                     | 4           |
| B. <u>INCORPORATED APPLICATION MATERIALS</u> .....            | 4           |
| <u>PERMIT SECTION II. - GENERAL FACILITY STANDARDS</u> .....  | 4           |
| A. <u>STANDARD PERMIT CONDITIONS</u> .....                    | 4           |
| 1. <u>Modification of Permitted Facilities</u> .....          | 4           |
| 2. <u>Duty to Comply</u> .....                                | 4           |
| 3. <u>Severability</u> .....                                  | 5           |
| 4. <u>Definitions</u> .....                                   | 5           |
| 5. <u>Permit Expiration</u> .....                             | 5           |
| 6. <u>Certification Requirements</u> .....                    | 5           |
| 7. <u>Land Disposal Restrictions</u> .....                    | 6           |
| 8. <u>Dust Suppression</u> .....                              | 7           |
| B. <u>RECORDKEEPING AND REPORTING REQUIREMENTS</u> .....      | 7           |
| 1. <u>Monitoring and Records</u> .....                        | 7           |
| 2. <u>Operating Record</u> .....                              | 8           |
| 3. <u>Retention of Application Data</u> .....                 | 8           |
| 4. <u>Reporting of Noncompliance</u> .....                    | 8           |
| 5. <u>Twenty-Four Hour Reporting</u> .....                    | 9           |
| 6. <u>Notice Waiver</u> .....                                 | 9           |
| 7. <u>Biennial Report</u> .....                               | 9           |
| 8. <u>Pollution Prevention</u> .....                          | 10          |
| 9. <u>Waste Minimization</u> .....                            | 10          |
| C. <u>INCORPORATED REGULATORY REQUIREMENTS</u> .....          | 10          |
| 1. <u>State Regulations</u> .....                             | 10          |
| 2. <u>Federal Regulations</u> .....                           | 11          |
| <u>PERMIT SECTION III. - FACILITY MANAGEMENT</u> .....        | 12          |
| A. <u>OPERATION OF FACILITY</u> .....                         | 12          |
| B. <u>PERSONNEL TRAINING</u> .....                            | 12          |
| C. <u>SECURITY</u> .....                                      | 12          |
| D. <u>GENERAL INSPECTION REQUIREMENTS</u> .....               | 12          |
| E. <u>CONTINGENCY PLAN</u> .....                              | 12          |
| <u>TABLE III.D. INSPECTION SCHEDULE</u> .....                 | 14          |
| <u>TABLE III.E.2. EMERGENCY COORDINATORS</u> .....            | 17          |
| <u>TABLE III.E.3. EMERGENCY EQUIPMENT</u> .....               | 18          |
| <u>PERMIT SECTION IV. - WASTES AND WASTE ANALYSIS -</u> ..... | 20          |
| A. <u>WASTE ANALYSIS PLAN</u> .....                           | 20          |
| B. <u>AUTHORIZED WASTES</u> .....                             | 20          |
| C. <u>SAMPLING AND ANALYTICAL METHODS</u> .....               | 21          |
| <u>TABLE IV.B. WASTES MANAGED IN PERMITTED UNITS</u> .....    | 22          |
| <u>TABLE IV.C SAMPLING AND ANALYTICAL METHODS</u> .....       | 23          |

**PERMIT TABLE OF CONTENTS (CONT.)**

|  | <b>Page</b> |
|--|-------------|
| <u>PERMIT SECTION V. - AUTHORIZED UNITS AND OPERATIONS</u> .....                     | 25          |
| A. <u>AUTHORIZED UNITS</u> .....   | 25          |
| B. <u>CONTAINER STORAGE AREAS</u> .....  | 25          |
| <u>PERMIT SECTION VI. - GROUNDWATER DETECTION MONITORING - Not Applicable</u> .....  | 28          |
| <u>PERMIT SECTION VII. - CLOSURE AND POST-CLOSURE REQUIREMENTS</u> .....             | 28          |
| A. <u>FACILITY CLOSURE</u> .....   | 28          |
| B. <u>FINANCIAL ASSURANCE FOR CLOSURE -- Not Applicable</u> .....                    | 31          |
| C. <u>STORAGE UNIT CLOSURE REQUIREMENTS</u> .....                                    | 31          |
| <u>PERMIT SECTION VIII. - LIABILITY REQUIREMENTS – Not Applicable</u> .....          | 31          |
| <u>PERMIT SECTION IX. - CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS</u> ..... | 31          |
| A. <u>NOTIFICATION OF RELEASE FROM SOLID WASTE MANAGEMENT UNIT</u> ..                | 31          |
| B. <u>CORRECTIVE ACTION OBLIGATIONS</u> .....  | 31          |
| C. <u>UNITS REQUIRING INVESTIGATION</u> .....  | 32          |
| D. <u>VARIANCE FROM INVESTIGATION</u> .....  | 32          |
| E. <u>RCRA FACILITY INVESTIGATION (RFI)</u> .....                                    | 33          |
| F. <u>RESPONSE ACTION PLAN (RAP)</u> .....   | 33          |
| G. <u>RESPONSE ACTION COMPLETION REPORT (RACR)</u> .....                             | 33          |
| <u>PERMIT SECTION X. - AIR EMISSION STANDARDS</u> .....                              | 34          |
| A. <u>PROCESS VENTS AND EQUIPMENT LEAKS</u> .....                                    | 34          |

List of Attachments:

- A - Legal Description of Facility
- B - Facility Map
- C - List of Incorporated Application Material
- D - List of Permitted Facility Units

PERMIT SECTION I. FACILITY DESCRIPTION

A. SIZE AND LOCATION OF SITE

A permit is issued to U.S. Army Air Defense Artillery Center and Fort Bliss (hereafter called the permittee), to operate a hazardous waste storage facility located immediately east of Biggs Army Air Field on Fort Bliss in El Paso County, Texas, drainage area of Segment 2308 of the Rio Grande Basin (North Latitude 31°50' 00", West Longitude 106°23' 00"). The legal description of the facility submitted in permit No. HW-50296 -000 application dated July 25, 2000 (revised September 26, 2000 and May 7, 2001) is hereby made a part of this permit as "Attachment A". The hazardous waste management facility as delineated by the permittee's application map is hereby made a part of this permit as "Attachment B".

B. INCORPORATED APPLICATION MATERIALS

This permit is based on, and the permittee shall follow the Part A and Part B Industrial and Hazardous Waste Application elements listed in "Attachment C", which are hereby approved subject to the terms of this permit and any other orders of the TNRCC. These materials are incorporated into this permit by reference as if fully set out herein. Any and all revisions to these elements shall become conditions of this permit upon the date of approval by the Commission.

PERMIT SECTION II. GENERAL FACILITY STANDARDS

A. STANDARD PERMIT CONDITIONS

The permittee has a duty to comply with the Standard Permit Conditions under 30 TAC Section 305.125. Moreover, the permittee has a duty to comply with the following permit conditions:

1. Modification of Permitted Facilities

The facility units and operational methods authorized are limited to those described herein and by the application submittals identified in Provision I.B. (Incorporated Application Materials). All facility units and operational methods are subject to the terms and conditions of this permit and TNRCC rules. Prior to constructing or operating any facility units in a manner which differs from either the related plans and specifications contained in the permit application or the limitations, terms or conditions of this permit, the permittee must comply with the TNRCC permit amendment/modification rules as provided in 30 TAC Sections 305.62 and 305.69.

2. Duty to Comply

[30 TAC Section 305.142] The permittee must comply with all the conditions of this permit, except that the permittee need not comply with the conditions of this permit to the extent and for the duration such noncompliance is authorized in an emergency order issued by the Commission. Any permit noncompliance, other than noncompliance authorized by an emergency order, constitutes a violation of RCRA and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

[II.A.]

3. Severability

The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

4. Definitions

For purposes of this permit, terms used herein shall have the same meaning as those in 30 TAC Chapters 305, 335 and 350 unless this permit specifically provides otherwise; where terms are not defined in the regulations or the permit, the meaning associated with such terms shall be defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

Application data - data used to complete the final application and any supplemental information.

5. Permit Expiration

In order to continue a permitted activity after the expiration date of the permit the permittee shall submit a new permit application at least 180 days before the expiration date of the effective permit, unless permission for a later date has been granted by the Executive Director. Authorization to continue such activity will terminate upon the effective denial of said application.

6. Certification Requirements

[30 TAC Section 305.144] For a new facility, the permittee may not commence storage, processing, or disposal of solid waste; and for a facility being modified, the permittee may not process, store or dispose of solid waste in the modified portion of the facility, except as provided in 30 TAC Section 305.69 (relating to Solid Waste Permit Modification at the Request of the Permittee) until the following has been accomplished:

- a. The permittee has submitted to the Executive Director and the local Regional Office of the TNRCC, by certified mail or hand delivery, a letter signed by the permittee, and signed and sealed by a Texas Licensed Professional Engineer stating that the facility has been constructed or modified in compliance with the permit. If the certification is being provided to document proper closure of a permitted unit, or to certify installation or repair of a tank system, then the certification must be signed and sealed by an independent Texas Licensed Professional Engineer. Required certification shall be in the following form:

[II.A.6.a.]

"This is to certify that the following activity (Specify activity, e.g., construction, installation, closure, etc., of an item) relating to the following item (Specify the item, e.g., the particular facility, facility unit, unit component, subcomponent part, or ancillary component), authorized or required by TNRCC Permit No. HW-50296-000, has been completed, and that construction of said facility component has been performed in accordance with and in compliance with good engineering practices and the design and construction specifications of Permit No. HW-50296-000."

- b. A certification report has been submitted, with the certification described in Provision II.A.6., which is logically organized and describes in detail the tests, inspections, and measurements performed, their results, and all other bases for the conclusion that the facility unit, unit component, and/or closure have been constructed, installed and/or performed in conformance with the design and construction specifications of this permit and in compliance with this permit. The report shall describe each activity as it relates to each facility unit or component being certified including reference to all applicable permit provisions. The report shall contain the following items, at a minimum:
- (1) Scaled, as-built plan-view and cross-sectional drawings which accurately depict the facility unit and all unit components and subcomponents and which demonstrate compliance with the design and construction specifications approved and detailed in the terms of this permit;
  - (2) All necessary references to dimensions, elevations, slopes, construction materials, thickness and equipment; and
  - (3) For all drawings and specifications, the date, signature, and seal of a Professional Engineer who is Licensed in the State of Texas.
- c. The Executive Director has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or if within 15 days of submission of the letter required by paragraph (a) of this section, the permittee has not received notice from the Executive Director of the intent to inspect, prior inspection is waived and the permittee may commence processing, storage, or disposal of solid waste.

\* 7. Land Disposal Restrictions

The permittee shall comply with the land disposal restrictions as found in 40 CFR 268 and any subsequent applicable requirements promulgated through the Federal Register. Requirements include modifying/amending the permittee's waste analysis plan to include analyses to determine compliance with applicable treatment standards or prohibition levels, pursuant to 40 CFR 268.7(c) and 264.13(a).

[II.A.]

8. Dust Suppression

Pursuant to 40 CFR 266.23(b)/30 TAC Section 335.214(b), the permittee shall not use waste, used oil, or any other material which is contaminated with dioxin, polychlorinated biphenyls (PCBs), or any other hazardous waste (other than a waste identified solely on the basis of ignitability) for dust suppression or road treatment.

B. RECORDKEEPING AND REPORTING REQUIREMENTS

1. Monitoring and Records

- a. All data submitted to the TNRCC shall be in a manner consistent with the latest version of the Quality Assurance Project Plan for the Texas Natural Resource Conservation Commission for Environmental Monitoring and Measurement Activities Relating to the Resource Conservation and Recovery Act (TNRCC QAPP).
- b. [30 TAC Section 305.125(11)(A)] Monitoring samples and measurements shall be taken at times and in a manner so as to be representative of the monitored activity. The method used to obtain a representative sample of the material to be analyzed shall be the appropriate method from Appendix I of 40 CFR Part 261 or an equivalent method approved by the Executive Director of the TNRCC. Laboratory methods shall be those specified in *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods*, SW-846, 1987, as revised; *Standard Methods for the Examination of Water and Wastewater, Fifteenth Edition, 1980, and 1981 supplement, or current adopted edition*; *RCRA Ground-Water Monitoring: Draft Technical Guidance, 1992*, OSWER Directive 9950.1, or an equivalent method, as specified in the Waste Analysis Plan, Section of the Part B Application, and as approved by the Executive Director.
- c. [30 TAC Section 305.125(11)(B)] The permittee shall retain in an organized fashion and furnish to the Executive Director, upon request, records of all monitoring information, copies of all reports and records required by this permit, and the certification required by 40 CFR 264.73(b)(9), for a period of at least 3 years from the date of the sample, measurement, report, record, certification, or application.
- d. [30 TAC Section 305.125(11)(C)] Records of monitoring shall include the following:
  - (1) The date, time, and place of sample or measurement;
  - (2) The identity of individual who collected the sample or measurement;
  - (3) The dates analyses were performed;
  - (4) The identity of individual and laboratory who performed the analyses;

[II.B.1.d.]

- (5) The analytical techniques or methods used; and
- (6) The results of such analyses or measurements.

2. Operating Record

In addition to the recordkeeping and reporting requirements specified elsewhere in this permit, the permittee shall maintain a written operating record at the facility, in accordance with 40 CFR 264.73. These records will be made available to representatives of the TNRCC upon request.

3. Retention of Application Data

[30 TAC Section 305.47] A permittee shall keep records throughout the term of the permit of data used to complete the final application and any supplemental information. All copies of renewals, amendments, revisions and modifications must also be kept at the facility such that the most current documents are available for inspection at all times. All materials, including any related information, submitted to complete the application shall be retained, not just those materials which have been incorporated into the permit.

4. Reporting of Noncompliance

The permittee shall report to the Executive Director of the TNRCC information regarding any noncompliance which may endanger human health or the environment. [30 TAC Section 305.125(9)]

- a. Report of such information shall be provided orally within 24 hours from the time the permittee becomes aware of the noncompliance.
- b. A written submission of such information shall also be provided within five days of the time the permittee becomes aware of the noncompliance. The written submission shall contain the following:
  - (1) a description of the noncompliance and its cause;
  - (2) the potential danger to human health or safety, or the environment;
  - (3) the period of noncompliance, including exact dates and times;
  - (4) if the noncompliance has not been corrected, the anticipated time it is expected to continue; and
  - (5) steps taken or planned to reduce, eliminate, and prevent the recurrence of the noncompliance, and to mitigate its adverse effects.



[II.B.]

5. Twenty-Four Hour Reporting

The following shall be included as information which must be reported orally within 24 hours pursuant to Title 30 TAC Section 305.125(9): [30 TAC Section 305.145]

- a. Information concerning release of any solid waste that may cause an endangerment to public drinking water supplies;
- b. Any information of a release or discharge of solid waste, or of a fire or explosion which could threaten the environment or human health or safety, outside the facility. The description of the occurrence and its cause shall include:
  - (1) name, address, and telephone number of the owner or operator;
  - (2) name, address, and telephone number of the facility;
  - (3) date, time, and type of incident;
  - (4) name and quantity of material(s) involved;
  - (5) the extent of injuries, if any;
  - (6) an assessment of actual or potential hazards to the environment and human health or safety outside the facility, where this is applicable; and
  - (7) estimated quantity and disposition of recovered material that resulted from the incident.

6. Notice Waiver

[30 TAC Section 305.145(b)] The Executive Director may waive the five-day written notice requirement specified in Provision II.B.4.b. (Reporting of Noncompliance) in favor of a written report submitted to the Commission within 15 days of the time the permittee becomes aware of the noncompliance or condition.

7. Biennial Report

The permittee shall prepare and submit to the Executive Director a Biennial Report. One copy of the report shall be submitted to the TNRCC Industrial and Hazardous Waste Permits Section and an additional copy shall be submitted to the appropriate TNRCC Regional Office by March 1st of each even-numbered year for the preceding odd-numbered year's activities. This report shall include, at a minimum, all information and records required by 40 CFR 264.75.

[II.B.]

8. Pollution Prevention

Facilities subject to 30 TAC Chapter 335, Subchapter Q - Pollution Prevention: Source Reduction and Waste Minimization, must prepare a five year Source Reduction and Waste Minimization Plan and submit a Source Reduction and Waste Minimization Annual Report (SR/WM Annual Report) to the TNRCC Small Business and Environmental Assistance Division. This report must be submitted annually on the dates specified in the rule.

9. Waste Minimization

The permittee shall annually certify, by January 25th for the previous calendar year, the following information, [40 CFR 264.73(b)(9)]:

- a. that the permittee has a program in place to reduce the volume and toxicity of all hazardous wastes which are generated by the permittee's facility operation to the degree determined to be economically practicable; and
- b. that the proposed method of treatment, storage, or disposal is that practicable method currently available to the permittee which minimizes the present and future threat to human health and the environment. This waste minimization certification is to be included in the facility operating records until closure.

C. INCORPORATED REGULATORY REQUIREMENTS

1. State Regulations

The following TNRCC regulations are hereby made provisions and conditions of this permit. Issuance of this permit with incorporated rules in no way exempts the permittee from compliance with any other applicable state statute and/or Commission Rule.

- a. 30 TAC Chapter 37, Subchapter P;
- b. 30 TAC Chapter 305, Subchapter A: General Provisions;
- c. 30 TAC Chapter 305, Subchapter C: Application for Permit;
- d. 30 TAC Sections 305.61 - 305.69 (regarding amendments, renewals, transfers, corrections, revocation and suspension of permits);
- e. 30 TAC Sections 305.121- 305.125 (regarding permit characteristics and conditions);
- f. 30 TAC Sections 305.127 - 305.129 (regarding permit conditions, signatories and variance procedures);

[II.C.1.]

- g. 30 TAC Chapter 305, Subchapter G: Additional Conditions for Hazardous and Industrial Solid Waste Storage, Processing and Disposal Permits;
- h. 30 TAC Chapter 335, Subchapter A
- i. 30 TAC Chapter 335, Subchapter B;
- j. 30 TAC Section 335.152;
- k. 30 TAC Sections 335.153 - 335.155;
- l. 30 TAC Chapter 335, Subchapter Q; and
- m. 30 TAC Chapter 350.

2. Federal Regulations

To the extent applicable to the activities authorized by this permit, the following provisions of 40 CFR Part 264 and Subpart 268, adopted by reference by 30 TAC Section 335.152, and 335 Subchapter O are hereby made provisions and conditions of this permit, to the extent consistent with the Texas Solid Waste Disposal Act, Texas Health and Safety Code Ann., Chapter 361 (Vernon), and the rules of the TNRCC:

- a. Subpart B -- General Facility Standards;
- b. Subpart C -- Preparedness and Prevention;
- c. Subpart D -- Contingency Plan and Emergency Procedures;
- d. Subpart E -- Manifest System, Recordkeeping, and Reporting;
- e. Subpart G -- Closure and Post-closure;
- f. Subpart I -- Use and Management of Containers;
- g. Subpart AA -- Air Emission Standards for Process Vents;
- h. Subpart BB -- Air Emission Standards for Equipment Leaks;
- \*\* i. Subpart CC -- Air Emission Standards for Tanks, Surface Impoundments, and Containers;
- j. 40 CFR Part 268 Land Disposal Restrictions.

PERMIT SECTION III. FACILITY MANAGEMENT

A. OPERATION OF FACILITY

The permittee shall construct, maintain, and operate the facility to minimize the possibility of a fire, explosion, or any unplanned, sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment, as required by 40 CFR 264.31. All equipment and structures used to manage hazardous waste at the facility shall be maintained in proper operating condition.

B. PERSONNEL TRAINING

The permittee shall ensure that all facility personnel involved with hazardous waste management successfully complete a training program as required by 40 CFR 264.16. The permittee shall maintain training documents and records, as required by 40 CFR 264.16(d) and (e).

C. SECURITY

1. The permittee shall provide and maintain an artificial or natural barrier that completely surrounds the active waste management portions of the facility and shall have a means to control entry, at all times, through gates or other entrances to these same facility areas.
2. The permittee shall post warning signs at all points of access to the active waste management portions of the facility and along the natural and/or artificial barriers in sufficient numbers to be seen from any approach to those portions of the facility. The signs shall be printed so that they may be clearly read from a distance of at least 25 feet, and shall state "Danger - Unauthorized Personnel Keep Out" in English and in Spanish.

D. GENERAL INSPECTION REQUIREMENTS

The permittee shall follow the inspection schedule contained in the permit application submittals identified in Provision I.B. (Incorporated Application Material) and as set out in Table III.D.- Inspection Schedule. The permittee shall remedy any deterioration or malfunction discovered by an inspection, as required by 40 CFR 264.15(c). Records of inspection shall be kept, as required by 40 CFR 264.15(d). Any remedial actions taken in response to facility inspections and the date of the remediation shall be included in the inspection records.

E. CONTINGENCY PLAN

1. The permittee shall follow the Contingency Plan, developed in accordance with 40 CFR Part 264 Subpart D, and contained in the permit application submittals identified in Provision I.B. (Incorporated Application Material). Copies of this plan shall be available to all employees involved in waste management at the facility.
2. The permittee shall immediately initiate clean-up procedures for removal of any spilled hazardous or industrial nonhazardous wastes and waste residues and shall take all steps necessary to prevent surface-water or groundwater contamination as a result of any spills.

[III.E.]

3. Collected hazardous or industrial nonhazardous wastes, spills, leaks, clean-up residues, and contaminated rainfall runoff, including contaminated stormwater from the drainage control systems associated with the permitted units, shall be removed promptly after the spillage and/or rainfall event in as timely a manner as is necessary to prevent overflow of the system by the following methods:
  - a. Removal to an on-site authorized facility unit;
  - b. Removal to an authorized industrial solid waste management facility or authorized off-site facility; or
  - c. Discharge in accordance with a wastewater discharge permit.
4. The permittee shall ensure that any equipment or vehicles which have come in contact with waste in the loading/unloading, storage, processing, and/or disposal areas have been decontaminated prior to their movement into designated uncontaminated areas of the site property. At a minimum, all contaminated equipment shall be externally decontaminated and contaminated vehicles shall have their undercarriages and tires or tracks decontaminated to remove all waste residues and to prevent contamination of uncontaminated areas. All wash water generated shall be collected and disposed of in accordance with Provision III.E.3.
5. Preparedness and Prevention
  - a. At a minimum, the permittee shall equip the facility as set forth in Table III.E.3.- Emergency Equipment, as required by 40 CFR 264.32.
  - b. All sumps, pumps, fire- and spill-control equipment, decontamination equipment, and all other equipment and structures authorized or required through the Contingency Plan shall be tested and maintained, as necessary, to assure its proper operation in time of emergency, as required by 40 CFR 264.33.
  - c. The permittee shall maintain access to the communications or alarm system, as required by 40 CFR 264.34.
  - d. A trained emergency coordinator shall be available at all times in case of an emergency and will have the responsibility for coordinating all emergency response measures as required by 40 CFR 264.55 and 264.56. Emergency numbers shall be posted in all waste management portions of the facility and all employees in those areas shall be trained in the location of those postings.

**TABLE III.D. INSPECTION SCHEDULE**  
 Hazardous Waste Container Storage Area - Building 11614

| <i>Facility Unit(s) and Basic Elements</i> | <i>Possible Error, Malfunction or Deterioration</i>      | <i>Frequency of Inspection</i> |
|--|--|--------------------------------|
| Container placement and stacking           | Insufficient isle space, stacks over 3 high, at capacity | Weekly                         |
| Container seals                            | Open lids  | Weekly                         |
| Container labels                           | Incomplete, missing, illegible                           | Weekly                         |
| Container condition                        | Corroded, leaking, damaged                               | Weekly                         |
| Segregation of incompatible wastes         | Incompatible wastes stored in the same storage area      | Weekly                         |
| Pallets                                    | Damaged, broken  | Weekly                         |
| Loading/unloading areas                    | Leaking containers, spills                               | Daily when loading/unloading   |
| Containment areas                          | Cracks in concrete, coating damaged, accumulated liquids | Weekly                         |
| Fences, signs, gates                       | Damaged, signs missing or illegible, unlocked gates      | Weekly                         |
| Fire/smoke alarm system                    | Sensors damaged, inoperable                              | Inspect daily, test monthly    |
| Fire Extinguishers                         | Missing, damaged, low pressure                           | Weekly                         |
| Eye wash/safety shower                     | Low water flow, dirty, caps missing or damaged           | Weekly                         |
| Fire hydrant                               | Low flow or pressure, damaged                            | Weekly                         |
| Spill Absorbent Materials                  | Missing, damaged, insufficient Quantity                  | Weekly                         |

Permittee: U.S. Army Air Defense Artillery Center and Fort Bliss

**TABLE III.D. INSPECTION SCHEDULE**  
 Hazardous Waste Container Storage Area - Building 11614

| AREA/EQUIPMENT                          | SPECIFIC ITEM   | TYPES OF PROBLEMS                            | FREQUENCY OF INSPECTION |
|---|---|--|-------------------------|
| Safety and Emergency Equipment          | Standard industrial absorbents (e.g., sorb-all, vermiculite)                      | Out of stock, saturated with water           | Weekly                  |
|   | Spare containers and overpack drums   | Corrosion, structural damage                 | Weekly                  |
|   | Emergency shower and eyewash  | Water pressure, leaking                      | Weekly                  |
|   | Face shields and goggles  | Broken or dirty                              | Weekly                  |
|   | Fire blankets   | Torn, worn, missing                          | Weekly                  |
|   | Ventilation system  | Not operating                                | Weekly                  |
|   | Fire extinguishers  | In need of recharging                        | Monthly                 |
|   | Fire alarm system   | Not operating                                | Monthly                 |
|   | First aid equipment and supplies  | Items out of stock, not sterile, inoperative | Monthly                 |
|   | Protective clothing (impermeable full body coveralls, gloves, and foot coverings) | Holes, worn                                  | Weekly*                 |
|   | Shovel (nonsparking)  | Missing, damaged                             | Weekly                  |
|   | Bung wrench (nonsparking)   | Missing, damaged                             | Weekly                  |
|   | Push broom  | Missing, damaged                             | Weekly                  |
|   | Security devices  | Signs  | Illegible               |
| Container storage building doors, locks |   | Locks missing, signs of tampering, unlocked  | Weekly*                 |
| Lighting                                |   | Burned out                                   | Weekly                  |

| AREA/EQUIPMENT            | SPECIFIC ITEM               | TYPES OF PROBLEMS   | FREQUENCY OF INSPECTION |
|---------------------------|-----------------------------|---|-------------------------|
| Building/load/unload area | Bases or foundation, ramps, | Structural integrity; e.g., erosion, uneven settlement, cracks, and sapling in concrete | Annually                |
|                           |                             | Wet spots from leaking containers   | Weekly                  |
| Warning siren             | Siren                       | Not operating   | Weekly                  |
| Mobile equipment          | Brakes                      | Worn pads, rotors   | Monthly                 |
|                           | Hydraulics Leaking          | Leaking   | Weekly                  |
|                           | Lights-running/emergency    | Burned out  | Prior to each use       |
|                           | Horns/sirens                | Inoperative   | During use              |
|                           | Battery                     | Inoperative, low water level  | Weekly                  |
|                           | Hydraulic oil level         | Low level, leaks  | Weekly                  |
|                           | Lubrication                 | Low level   | Weekly                  |
|                           | Tire condition              | Worn, low pressure  | Weekly                  |
|                           | Safety equipment            | Inoperative   | Weekly                  |
|                           | General condition           | Deficiencies  | Weekly                  |
|                           | Instruments                 | Inoperative   | Weekly                  |
|                           | Shutdown precautions        | Incorrectly performed   | Weekly                  |
|                           | MHE drum lifter/handler     | Missing, inoperative  | Weekly                  |





**TABLE III.E.3. EMERGENCY EQUIPMENT**

| <i>Equipment</i>                    | <i>Location</i>  | <i>Physical Description</i>                         | <i>Capabilities</i>                        |
|-------------------------------------|--|---|--|
| Fire Extinguishers (2)              | Inside Unit 001 (Bldg 11614)                                       | Chemical fire extinguishers                         | Class A, B, C, fires                       |
| Absorbent Booms                     | Inside Unit 001 (Bldg 11614)                                       | PolySorb Booms                                      | Absorb spilled liquids,<br>temporary berms |
| Respirators                         | Inside Unit 001 (Bldg 11614)                                       | Full-face cartridge type                            | Personnel protection                       |
| Absorbent Rags                      | Inside Unit 001 (Bldg 11614)<br>and scale area                     | Fabric rags   | Absorb spilled liquids                     |
| Vermiculite                         | Inside Unit 001 (Bldg 11614)<br>and scale area                     | Medium texture                                      | Absorb spilled liquids                     |
| Shovels, Brooms                     | Inside Unit 001 (Bldg 11614)<br>and scale area                     | Commercially available                              | Remove solid spills and debris             |
| Fire Hydrant                        | West of Building 11614   | 6" Supply line                                      | Fire Suppression                           |
| Fire/smoke Detectors                | Inside Units 001, 004, 005,<br>006, and 007 (all covered<br>areas) | Smoke and heat detectors with<br>radio relay system | Fire and smoke detection                   |
| Fire/smoke Alarm                    | Ft. Bliss Fire Station<br>and Building 11614 area                  | Audible alarm                                       | Fire and smoke detection                   |
| First Aid Equipment and<br>Supplies | Inside Unit 001 (Bldg 11614)<br>and scale area                     | First aid kit                                       | First aid for minor injuries               |
| Protective Clothing                 | Inside Unit 001 (Bldg 11614)<br>and scale area                     | Tyvek Coveralls                                     | Personnel Protection                       |
| Safety Shower                       | Adjacent to Units 004, 006,<br>and 007                             | Eyewash and Safety shower                           | Eyewash and Safety Shower                  |
| Tractors (2), Dump Trucks (3)       | Building 1073  | Full tracked with blade                             | Earth moving                               |
| Front end Loader                    | Building 1073  |   | Earth moving                               |
| Vacuum Trucks (2)                   | Building 1073  | Sweeper   | Spill and accumulated liquid<br>removal    |
| Fire Trucks                         | Fire Station   |   | Fire suppression                           |

| <i>Equipment</i>                    | <i>Location</i>                             | <i>Physical Description</i> | <i>Capabilities</i>              |
|-------------------------------------|---|-----------------------------|----------------------------------|
| Grader (10)                         | Buildings 1073 and 9525                     |                             | Earth moving                     |
| Chemical Goggles, Face Shields      | Building 11121                              | Plastic                     | Personnel protection             |
| Gloves, Coveralls, Boots            | Inside Unit 001 (Bldg 11614) and scale area | Chemical resistant          | Personnel protection             |
| Self-contained Breathing Apparatus  | Building 11121                              |                             | Personnel Protection             |
| Vinegar, Sodium Bicarbonate         | Building 11121                              |                             | Spill neutralization             |
| Sand Bags                           | Building 11121                              |                             | Spill containment                |
| Spare Containers and Overpack Drums | Inside Unit 001 (Bldg 11614)                | 85-gallon                   | Spill prevention and containment |

Note 1: Scale area is located south of Unit 002.

PERMIT SECTION IV. WASTES AND WASTE ANALYSIS

A. WASTE ANALYSIS PLAN

The permittee shall follow the Waste Analysis Plan, developed in accordance with 40 CFR 264.13 and the permit application identified in Provision I.B. (Incorporated Application Material).

B. AUTHORIZED WASTES

1. The permittee is authorized to manage hazardous wastes listed in Table IV.B. - Wastes Managed in Permitted Units, subject to the limitations provided herein.

Wastes authorized for storage include those generated from sources on the US Army Air Defense Artillery Center and Fort Bliss facility.

2. Hazardous Waste Received From Off-Site Sources

The permittee may not receive hazardous or nonhazardous waste from off-site sources.

3. The wastes authorized in Table IV.B. shall not contain any of the following:

- a. Polychlorinated biphenyls (PCBs), as defined by the EPA in regulations issued pursuant to the Toxic Substances Control Act under Title 40 Code of Federal Regulations (CFR) Part 761, unless the permittee is compliant with the federal requirements for PCB storage as specified in 40 CFR Part 761;
- b. Radioactive wastes unless the permittee is authorized to store, process and dispose of these wastes in compliance with specific licensing and permitting requirements under Chapter 401 of the Texas Health and Safety Code and the rules of the Texas Natural Resource Conservation Commission or Texas Department of Health or Texas Railroad Commission, and/or any other rules of state or federal authorities;
- c. Explosive material, as defined by the Department of Transportation under 49 CFR Part 173;
- d. Dioxin-containing wastes, identified by EPA as F020, F021, F022, F023, F026, and F027 wastes in 40 CFR 261.31;
- e. Ignitable compressed gases;
- f. Municipal garbage; or
- g. Special Waste from Health-Care Related Facilities subject to 25 TAC Chapter 1 or 30 TAC Chapter 330.

[IV.B.]

4. Prior to accepting any additional wastes not authorized in Table IV.B., the permittee shall follow the permit amendment or modification requirements listed in 30 TAC Section 305.62 and 305.69.
5. The permittee may store wastes restricted under 40 CFR Part 268 solely for the purpose of accumulating quantities necessary to facilitate proper recovery, treatment, or disposal provided that it meets the requirements of 40 CFR 268.50(a)(2) including, but not limited to the following:
  - a. Clearly marking each container to identify its contents and the date each period of accumulation begins;
  - b. Clearly marking each tank with a description of its contents, the quantity of each hazardous waste received, and the date each period of accumulation begins, or such information for each tank is recorded and maintained in the operating record at that facility.

C. SAMPLING AND ANALYTICAL METHODS

1. Table IV.C. - Sampling and Analytical Methods, shall be used in conjunction with the Waste Analysis Plan referenced in Provision IV.A., in performing all waste analyses.
2. The permittee shall ensure that all waste analyses utilized for waste identification or verification have been performed in accordance with methods specified in the current editions of "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods", (SW-846), ASTM or other methods accepted by the TNRCC. The permittee shall have a QA/QC program that is consistent with EPA SW 846 and the TNRCC RCRA QAPP.

Permittee: U.S. Army Air Defense Artillery Center and Fort Bliss

**TABLE IV.B. WASTES MANAGED IN PERMITTED UNITS  
HAZARDOUS WASTES AND MANAGEMENT ACTIVITIES  
CONTAINER STORAGE AREA BIGGS FIELD  
FORT BLISS, TX**

| Description of Waste   | TNRCC Waste Code | EPA Hazardous Waste Code | EPA Hazardous Waste Code                       | Off-Site Disposal | On-Site Storage | Annual Quantity Generate and/or Received lbs/year | Site Code and Process |
|--|------------------|--------------------------|--|-------------------|-----------------|---|-----------------------|
| Spent Solvent (isopropyl alcohol)                            | 0002 219         | III                      | D001   | x                 | x               |   | 9900                  |
| Adhesives, Epoxies   | 0009 210         | III                      | D001, D043                                     | x                 | x               |   | 9900                  |
| Paint Thinner or Petroleum Distillates                       | 0014 211         | IIH                      | D001   | x                 | x               |   | 9900                  |
| Spent Batteries (Ni-Cd, Cr containing)                       | 0015 309         | III                      | D006, D007                                     | x                 | x               |   | 9900                  |
| Sodium Hydroxide (caustic aqueous waste)                     | 0025 110         | III                      | D002   | x                 | x               |   | 9900                  |
| Spent Solvent (halogenated) 1-2 dichlorobenzene              | 0027 202         | IIH                      | U070   | x                 | x               |   | 9900                  |
| Organic Paint, Laquer, Ink, metal polish or Varnish          | 0031 209         | III                      | D001, D036, F003, F005, D036                   | x                 | x               |   | 9900                  |
| Ignitable Chemicals (cleanup spill residues, fuel filteres)  | 0032 219         | IIH                      | D001   | x                 | x               |   | 9900                  |
| Spent Lithium Batteries                                      | 0034 309         | IIH                      | D003   | x                 | x               |   | 9900                  |
| Laboratory Waste (chemical lab packs)                        | 0035 001         | IIH                      | D001, D002, D003, D005, D009, D011             | x                 | x               |   | 9900                  |
| Paint Thinner or Petroleum Distillates                       | 0038 211         | III                      | D001, D008                                     | x                 | x               |   | 9900                  |
| Acid, Heavy Metal Contaminated                               | 0039 103         | III                      | D002, D008                                     | x                 | x               |   | 9900                  |
| Pesticide Waste and Characteristic Waste                     | 0040 219         | IIH                      | D004, D005, D012, D013, D014, D015, D020, D031 | x                 | x               |   | 9900                  |
| Herbicide Waste  | 0041 219         | IIH                      | D016, D017                                     | x                 | x               |   | 9900                  |
| Cleaner, Lubricant   | 0042 202         | IIH                      | F001   | x                 | x               |   | 9900                  |
| Paint Thinner or Petroleum Distillates (sludges)             | 0046 211         | III                      | D001, F005                                     | x                 | x               |   | 9900                  |
| Jet Fuel (JP-8)  | 0048 211         | IIH                      | D001, D007                                     | x                 | x               |   | 9900                  |
| Waste Oil (contaminated with fuels, water, dirt, antifreeze) | 0049 206         | IIH                      | D001, D008                                     | x                 | x               |   | 9900                  |
| Corrosive Waste (cleanup spill residues, lab waste)          | 0051 105         | III                      | D002   | x                 | x               |   | 9900                  |
| Spent Solvent (non-halogenated)                              | 0056 203         | III                      | D018, U019                                     | x                 | x               |   | 9900                  |
| Spent Solvent (halogenated) chloroform                       | 0060 202         | IIH                      | U044   | x                 | x               |   | 9900                  |
| Chromium-Toxicity Characteristic Waste (filters, batteries)  | 0061 319         | IIH                      | D007   | x                 | x               |   | 9900                  |
| Concentrated Phenolics (cizesols)                            | 0063 208         | IIH                      | F004, U052                                     | x                 | x               |   | 9900                  |
| Toxicity Characteristic Waste (oily sludge)                  | 0079 603         | III                      | D004, D006, D008, D018                         | x                 | x               |   | 9900                  |
| Mercury Toxicity Characteristic Waste                        | 0080 309         | III                      | D009   | x                 | x               |   | 9900                  |
| Organic Liquids (formaldehyde)                               | 0086 219         | III                      | U122   | x                 | x               |   | 9900                  |
| Batteries (cadmium)  | 0089 309         | IIH                      | D006   | x                 | x               |   | 9900                  |
| Halogenated Pesticide Solid (lindane)                        | 0094 401         | IIH                      | D013   | x                 | x               |   | 9900                  |
| Caustic Solution with Metals (silver, barium)                | 0095 106         | IIH                      | D005, D011                                     | x                 | x               |   | 9900                  |
| Organic Gases (aerosols)                                     | 0116 801         | IIH                      | D001, F001, F002, F003, F004, F005             | x                 | x               |   | 9900                  |

**TABLE IV.C**  
Sampling and Analytical Methods

| <i>Waste No.<sup>1</sup></i> | <i>Sampling Location</i>          | <i>Sampling Method</i>           | <i>Frequency</i>      | <i>Parameter</i>   | <i>Test Method.<sup>3</sup></i> | <i>Desired Accuracy Level</i> |
|------------------------------|-----------------------------------|----------------------------------|-----------------------|--|---------------------------------|-------------------------------|
| 009                          | Permitted Container Storage Areas | 1020A<br>5030B                   | Annually or as needed | Ignitability<br>VOC's  | 1020A<br>8260B                  | 4                             |
| 015                          | Permitted Container Storage Areas | 9040<br>3015                     | Annually or as needed | pH,<br>Total metals (cadmium)                                  | 9040<br>6020                    | 4                             |
| 031                          | Permitted Container Storage Areas | 5030B<br>3015                    | Annually or as needed | VOC's, RCRA metals   | 8260B<br>6020                   | 4                             |
| 039                          | Permitted Container Storage Areas | 9040<br>3015                     | Annually or as needed | pH, RCRA metals  | 9040<br>6020                    | 4                             |
| 048                          | Permitted Container Storage Areas | 1020A<br>5030B                   | Annually or as needed | Ignitability, VOC's  | 1020A<br>8260B                  | 4                             |
| 049                          | Permitted Container Storage Areas | 1020A<br>5030B<br>3015<br>NA     | Annually or as needed | Ignitability<br>VOC's<br>RCRA Metals<br>Total Organic Halogens | 1020A<br>8260B<br>6020<br>9020  | 4                             |
| 051                          | Permitted Container Storage Areas | 9040<br>SW 7.3.3.2<br>SW 7.3.4.2 | Annually or as needed | pH<br>Reactivity   | 9040<br>9010B<br>9030B          | 4                             |

TABLE IV.C (Continued)

| <i>Waste No.<sup>1</sup></i>   | <i>Sampling Location</i> | <i>Sampling Method</i>       | <i>Frequency</i>      | <i>Parameter</i>   | <i>Test Method.<sup>3</sup></i> | <i>Desired Accuracy Level</i> |
|--|--------------------------|------------------------------|-----------------------|--|---------------------------------|-------------------------------|
| Antifreeze <sup>2</sup>  |                          | 5030B<br>3015                | Annually or as needed | VOC's<br>RCRA metals   | 8260B<br>6020                   | 4                             |
| Rags <sup>2</sup>  |                          | 5030B                        | Annually or as needed | VOC's  | 8260B                           | 4                             |
| Soil contaminated <sup>2</sup> with petroleum hydrocarbons                 |                          | NA<br>3015                   | Annually or as needed | TPH<br>BTEX  | TX1005<br>8021                  | 4                             |
| Sludge from <sup>2</sup> oil-water separators/oil in abandoned containers. |                          | 1020A<br>5030B<br>3015<br>NA | Annually or as needed | Ignitability<br>VOC's<br>RCRA metals<br>Total Organic Halogens | 1020A<br>8260B<br>6020<br>9020  | 4                             |

<sup>1</sup>from Table IV.B, first column

## Notes:

1. Hazardous wastes identified in Table IV.B and not included in Table IV.C are classified based on process knowledge. A majority of these wastes are spent solvents (listed wastes) or ignitability characteristic wastes.
2. Fort Bliss is a non-industrial facility. These non-RCRA wastes are tested as detailed in the Waste Analysis Plan to verify Characterization.
3. SW846 method
4. The accuracy levels are consistent with the requirements for EPA methods.

SW-846 "Test Methods for Evaluation Solid Waste" Third Edition, November 1986, EPA.

VOC's – Volatile Organic Compounds

TPH – Total Petroleum Hydrocarbons

BIEX – Benzene, Toluene, Ethyl Benzene and XY lines

NA – No specified method number



PERMIT SECTION V. AUTHORIZED UNITS AND OPERATIONS

A. AUTHORIZED UNITS

1. The permittee is authorized to operate the facility units listed in "Attachment D" for storage subject to the limitations herein. All waste management activities not otherwise exempted from permitting under 30 Texas Administrative Code (TAC) Section 335.2 shall be confined to the authorized facility units listed in "Attachment D". References hereinafter in this permit to "TNRCC Permit Unit No. \_\_\_" shall be to the facility units listed in "Attachment D". All authorized units must be clearly identified as numbered in "Attachment D". These units must have signs indicating "TNRCC PERMIT UNIT NO. \_\_\_".
2. The permittee shall comply with 40 CFR 264.17, relating to general requirements for ignitable, reactive, or incompatible wastes.
3. The permittee shall prevent inundation of any permitted units and prevent any discharges of any waste or runoff of waste contaminated stormwater from permitted units. Additionally, each loading or unloading area, associated with a permitted hazardous or nonhazardous waste management unit, shall be provided with a drainage control system which will collect spills and precipitation in such a manner as to satisfy the following:
  - a. Preclude the release from the system of any collected spills, leaks or precipitation;
  - b. Minimize the amount of rainfall that is collected by the system; and
  - c. Prevent run-on into the system from other portions of the facility.

B. CONTAINER STORAGE AREAS

1. Container storage areas and their approved waste types are shown in Table V.B. - Container Storage Areas. The permittee is authorized to operate the facility container storage areas for storage subject to the limitations contained herein.
2. Containers holding hazardous waste shall be managed in accordance with 40 CFR 264.171, Condition of containers; 40 CFR 264.172, Compatibility of waste with containers; and 40 CFR 264.173, Management of containers.
3. The permittee shall construct and maintain the containment systems for the container storage areas in accordance with the drawings and details included in the Part B Application. At a minimum, the containment system must meet the requirements of 40 CFR 264.175.
4. In addition to the requirements of Permit Provisions V.B.1 through 3, the following requirements shall apply:
  - a. Storage of wastes in Unit No. 1 ( TNRCC Permit Unit No. 1) shall be in accordance with the following requirements:

**TABLE V.B CONTAINER STORAGE AREAS**  
Building 11614

List the container storage areas covered by this application to be permitted. List the waste managed in each unit and the rated capacity or size of the unit.

| NO.           | Container Storage Area          | N.O.R. UNIT # | WASTE #s from Table IV.B                                    | RATED CAPACITY          | DIMENSIONS                             | STACKING HEIGHT    | AISLE SPACING | CONTAINMENT VOLUME      | IGNITABLE, REACTIVE INCOMPATIBLE WASTE |
|---------------|---------------------------------|---------------|---|-------------------------|--|--------------------|---------------|-------------------------|--|
| 001           | Bldg 11614 (inside)             | 001           | All   | 8,800 gallons           | 24' X 40'4"                            | 3 drums on shelves | 30"           | 4003 gallons            | Y                                      |
| 002           | Concrete Pad outside Bldg 11614 | 002           | All except those with free liquids                          | 31,900 gallons          | 81' x 20 sq. ft.                       | 2 drums            | 24"           | Not required            | N                                      |
| 004           | Covered areas                   | 004           | All except those with free liquids                          | 16,720 gallons          | Unit 3A-16' x 32'<br>Unit 3B-16' x 32' | 2 drums            | 24"           | Not required            | N                                      |
| 005, 006, 007 | Modular Buildings               | 005, 006, 007 | All   | 6,160 gallons each unit | 20' x 25'<br>(3 identical units)       | 3 drums on shelves | 126"          | 2,485 gallons each unit | Y                                      |
| 008           | Concrete Storage Pad            | 008           | All except those with free liquids and incompatible wastes. | 47,520 gallons          | 112' x 30'                             | 2 drums            | 30"           | Not Required            | N                                      |

<sup>1</sup> If YES, provide in the engineering report drawings demonstrating compliance with the buffer zone requirement of 40 CFR 264.17 and 264.176.

<sup>2</sup> If YES, provide in the engineering report a description of the procedures used to ensure compliance with 40 CFR 264.17 and 264.177.

[V.B.4.a.]

1. The aisle spacing between double rows of containers shall be a minimum of 15 feet;
  2. Containers shall be elevated from the floor by pallets, racks, or shelves; and
  3. Containers with incompatible wastes shall be stored in different racks that have separate containment systems.
- b. Storage of wastes in Unit No. 2 (TNRCC Permit Unit No. 2) shall be in accordance with the following requirements:
1. Wastes that contain free liquids shall not be stored in this unit;
  2. Containers shall be stored on pallets;
  3. Containers with incompatible wastes shall not be stored in this unit;
  4. A minimum of 36 inches of aisle spacing shall be maintained between double rows of drums.
  5. Drums (55 gallon) shall not be stacked more than two drums high; and
  6. Pallets will be used between layers of stacked drums.
- c. Storage of wastes in Unit No. 3A (TNRCC Permit Unit No. 3) and Unit No. 3B (TNRCC Permit Unit No. 4) shall be in accordance with the following requirements:
1. Wastes that contain free liquids shall not be stored in this unit;
  2. Containers shall be stored on pallets;
  3. Containers with incompatible wastes shall not be stored in this unit;
  4. A minimum of 24 inches of aisle spacing shall be maintained between double rows of containers;
  5. Drums (55 gallon) shall not be stacked more than two drums high; and
  6. Pallets will be used between layers of stacked drums.

[V.B.4.]

- d. Storage of wastes in Units No. 4 (TNRCC Permit Unit No. 5), Unit No. 5 (TNRCC Permit Unit No. 6), and Unit No. 6 (TNRCC Permit Unit No. 7) shall be in accordance with the following requirements:
  1. The aisle spacing between double rows of containers shall be a minimum of 13 feet;
  2. Containers shall be elevated from the floor by pallets, racks, or shelves; and
  3. Containers with incompatible wastes shall be stored in different units.
- e. Storage of wastes in Unit No. 7 (TNRCC Permit Unit No. 8) shall be in accordance with the following requirements:
  1. Wastes that contain free liquids shall not be stored in this unit;
  2. Containers shall be stored on pallets;
  3. Containers with incompatible wastes shall not be stored in this unit;
  4. A minimum of 36 inches of aisle spacing shall be maintained between double rows of containers;
  5. Drums (55 gallon) shall not be stacked more than two drums high; and
  6. Pallets will be used between layers of stacked drums.

PERMIT SECTION VI. GROUNDWATER DETECTION MONITORING – Not Applicable

PERMIT SECTION VII. CLOSURE AND POST-CLOSURE REQUIREMENTS

A. FACILITY CLOSURE

1. The permittee shall follow the closure plan, developed in accordance with 40 CFR Part 264 Subpart G, and contained in the permit application submittals identified in Provision I.B. (Incorporated Application Material) of this permit.

Additionally, facility closure shall also commence:

- a. Upon direction of the TNRCC for violation of the permit, TNRCC Rules, or State Statutes; or
- b. Upon suspension, cancellation, or revocation of the terms and conditions of this permit concerning the authorization to receive, store, process, or dispose of waste materials; or
- c. Upon abandonment of the site.

[VII.A.1.]

2. Request for Permit Modification or Amendment

The permittee shall submit a written request for a permit modification or amendment to authorize a change in the approved Closure Plan, in accordance with 40 CFR 264.112 (c). The written request shall include a copy of the amended Closure Plan for approval by the Executive Director.

3. Time Frames for Modification\Amendment Request Submittal

The permittee shall submit a written request for a permit modification or amendment in accordance with the time frames in 40 CFR 264.112 (c)(3).

4. Closure Notice and Certification Requirements

a. The permittee shall notify the Executive Director, in writing, at least 60 days prior to the date on which he expects to begin partial or final closure of a surface impoundment, or landfill unit, or final closure of a facility with such a unit; or at least 45 days prior to the date on which he expects to begin partial or final closure of a facility with processing or storage tanks, container storage, or incinerator units; or at least 45 days prior to the date on which he expects to begin partial or final closure of a boiler or industrial furnace, whichever is earlier. A copy of the notice shall be submitted to the TNRCC Regional Office.

b. The permittee shall notify the TNRCC Regional Office at least ten (10) days prior to any closure sampling activity required by the permit in order to afford regional personnel the opportunity to observe these events and collect samples.

5. Unless the Executive Director approves an extension to the closure period, as per the requirements of 40 CFR 264.113(b), the permittee must complete partial and final closure activities within 180 days after receiving the final volume of hazardous wastes at the hazardous waste management unit or facility.

6. As per the requirements of 40 CFR 264.115, within 60 days of completion of closure of each permitted hazardous waste surface impoundment, or landfill unit, and within 60 days of the completion of final closure, the permittee shall submit to the Executive Director, by registered mail, with a copy to the TNRCC Regional Office, a certification that the hazardous waste management unit or facility, as applicable, has been closed in accordance with the specifications in the approved Closure Plan and this permit. The certification, which shall be signed by the permittee and by an independent licensed professional engineer, must be in the form described in Provision II.A.6. A closure certification report shall be submitted with the required certifications which includes a summary of the activities conducted during closure and the results of all analyses performed. The certification report shall contain the information required by Provision II.A.6., and 30 TAC 350.32 (Texas Risk Reduction Program (TRRP) Remedy Standard A) Section 350.95

[VII.A.6.]

(Response Action Completion Report (RACR). Documentation supporting the independent licensed professional engineer's certification shall be furnished to the Executive Director upon request.

7. Final closure is considered complete when all hazardous waste management units at the facility have been closed in accordance with all applicable closure requirements so that hazardous waste management activities under 40 CFR Part 264 and 265 are no longer conducted at the facility unless subject to the provisions in 40 CFR 262.34.
8. All units, sumps, pumps, piping and any other equipment or ancillary components which have come in contact with hazardous wastes shall either be decontaminated by removing all waste, waste residues, and sludges or be disposed of at an authorized off-site facility.
9. All contaminated equipment/structures, liners, dikes, and soils (i.e., debris) intended for land disposal shall be treated in a manner which meets or exceeds the treatment standards for hazardous debris contained in 40 CFR 268.45 or removed and managed at an authorized industrial solid waste management facility.
10. All hard-surfaced areas within the hazardous waste management unit areas shall be decontaminated and the wash water generated treated and/or disposed of at an authorized off-site facility.
11. Verification of decontamination shall be performed by analyzing wash water, and as necessary, soil samples for the hazardous constituents which have been in contact with the particular item being decontaminated. In addition, the permittee shall perform visual inspections of the equipment/structures for visible evidence of contamination.
12. Unless it can be demonstrated that soil contamination is unlikely to have occurred, soils shall be sampled and analyzed. Sufficiently detailed analyses of samples representative of soils remaining in non-hard-surfaced areas of the storage and processing facility area shall be performed to verify removal or decontamination of all waste and waste residues.
13. Soil and/or wash-water samples shall be analyzed in accordance with the methods specified in the current editions of "Test Methods for the Evaluation of Solid Waste" (SW-846) or other methods which are officially recommended by the EPA.
14. Decontamination shall be deemed complete when no visible evidence of contamination is observed and when the results from verification sampling and analyses indicate wash water concentrations and/or soil concentrations are below the applicable critical PCL for Remedy Standard A.

If the underlying soils are decontaminated or removed to the PCL for Remedy Standard A, Commercial/Industrial Land use, the permittee shall comply with the institutional controls requirements of 30 TAC Section 350.111 as required.

[VII.]

B. FINANCIAL ASSURANCE FOR CLOSURE – NOT APPLICABLE

C. STORAGE UNIT CLOSURE REQUIREMENTS

The permittee shall close the storage units identified as TNRCC Permit Unit Nos. 1 through 8 in accordance with the approved Closure Plans, 40 CFR Part 264, Subpart G, 40 CFR, 264.178 (container storage), the Texas Risk Reduction Program of 30 TAC Chapter 350.

PERMIT SECTION VIII. LIABILITY REQUIREMENTS – Not Applicable

PERMIT SECTION IX. CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS

A. NOTIFICATION OF RELEASE FROM SOLID WASTE MANAGEMENT UNIT  
(Texas Health and Safety Code, Section 361.303)

If a solid waste management unit (SWMU) or area of contamination not previously addressed in the RCRA Facility Assessment (RFA) dated March, 1989, or any release of hazardous waste or hazardous constituents that may have occurred from any SWMU, is discovered subsequent to issuance of this permit, the permittee shall notify the Executive Director in writing within fifteen (15) days of the discovery. Within forty-five (45) days of such discovery, the permittee shall submit an RFA for that unit or release which shall be based on U.S. EPA RCRA Facility Assessment Guidance, October 1986, NTIS PB 87-107769. If the RFA indicates a release or suspected release warrants further investigation, the permittee shall comply with the requirements of Section IX of this permit.

B. CORRECTIVE ACTION OBLIGATIONS

The permittee shall conduct corrective action as necessary to protect human health and the environment for all releases of hazardous waste and hazardous constituents from any solid waste management unit (SWMU). The permittee shall fulfill this obligation by conducting a Corrective Action Program which consists of the Affected Property Assessment (APA) and the Response Action Plan (RAP). The permittee shall conduct an APA to determine whether hazardous waste or hazardous constituents listed in 40 CFR Part 261, Appendix VIII and/or 40 CFR Part 264, Appendix IX have been released to into the environment. Upon completion of the RFI the Permittee shall submit to the TNRCC an Affected Property Assessment Report (APAR) to determine whether hazardous waste or hazardous constituents listed in 40 CFR Part 261, Appendix VIII and/or 40 CFR Part 264, Appendix IX have been released into the environment. If it is determined that hazardous waste or hazardous constituents have been or are being released into the environment, then the permittee may be required to implement those activities listed in the Response Action Plan (RAP)

[IX.B.]

to protect human health and the environment. Upon completion of the (RAP) implementation the permittee must submit to the TNRCC, a Response Action Effectiveness Report (RAER) which details the activity that will be taken to remove, decontaminate and/or control chemicals of concern (COC) which may be present at the facility in excess of critical Protective Concentration Levels (PCLs) in the environmental media. The report shall include actions taken in response to releases to environmental media from waste management unit(s) before, during, or after closure.

Upon Executive Director's review of the Corrective Action Program obligations, the permittee may be required to perform any or all of the following:

1. conduct investigation(s);
2. provide additional information;
3. conduct additional investigation(s);
4. investigate an additional unit(s);
5. proceed to the next task in the Corrective Action Program; and/or
6. submit an application for a new compliance plan or modification to an existing compliance plan to implement corrective measures.

Any additional requirements must be completed within the time frame(s) specified by the Executive Director.

C. UNITS REQUIRING INVESTIGATION

The permittee shall conduct an RFI for the following SWMU(s) and/or area(s) of contamination in accordance with Provision IX.E.:

1. FTBL#83 Biggs AFB Former Fueling Facility
2. FTBL#30 (SWMU #64) Closed Castner Firing Range

D. VARIANCE FROM INVESTIGATION

The permittee may elect to certify that no hazardous waste or hazardous constituents listed in 40 CFR Part 261, Appendix VIII and/or 40 CFR Part 264, Appendix IX are or were present/managed in a unit listed in Provision IX.C. in lieu of performing the investigation required in Provisions IX.B. and E., provided that confirming data is submitted for the current and past waste(s) managed in the respective unit. The permittee shall submit such information and certification(s) on a unit-by-unit basis in the time frame required in Provision IX.E. for review and approval by the Executive Director of the TNRCC. If the permittee cannot demonstrate and certify that hazardous waste or hazardous constituents are not or were not present in a particular unit, the investigation required in Provisions IX.B. and E. shall be performed for the unit.



[IX.]

E. RCRA FACILITY INVESTIGATION (RFI)

Within sixty (60) days of the discovery of additional SWMUs the permittee shall submit a schedule for completion of the RFI(s) for the SWMU(s) or area(s) of contamination listed in Provision IX.C. to the Executive Director for approval. Also, within sixty (60) days of approval of an RFA Report which recommends further investigation of a SWMU(s) or area(s) of contamination in accordance with Provision IX.A., the permittee shall submit a schedule for completion of the RFI(s) to the Executive Director for approval. The permittee shall initiate the investigations in accordance with the approved schedule and shall address all of the items for RFI Workplans and RFI Reports contained in U.S. EPA publication EPA/520-R-94-004, OSWER Directive 9902.3-2A, RCRA Corrective Action Plan (Final), May 1994. If the permittee elects to use an alternate investigation approach, Executive Director approval of the workplan will be required prior to initiation of investigation(s). The results of the RFI must be submitted to the Executive Director for approval in the form of an APAR Report within the time frame established in the approved schedule. The APAR Report must document results of the investigation(s). The report shall be considered complete when the full nature and extent of the contamination, Quality Assurance/Quality Control procedures and Data Quality Objectives are documented to the satisfaction of the Executive Director. The permittee shall propose or conduct stabilization/interim corrective measures, as necessary, to protect human health and the environment.

F. RESPONSE ACTION PLAN (RAP)

Upon approval of the activities outlined in the APAR Report, if it is determined that there has been a release into the environment of hazardous waste or hazardous constituents listed in 40 CFR Part 261, Appendix VIII and/or 40 CFR Part 264 Appendix IX, which appears to be a risk to human health and the environment, then within the time frame(s) specified by the Executive Director following approval of the APAR Report, the permittee shall submit a RAP. This plan shall evaluate the risk, identify and evaluate corrective measure alternatives and recommend appropriate corrective measure(s) to protect human health and the environment. The RAP shall address all of the applicable items in 30 TAC 350 Subchapter B and Subchapter E and the U.S. EPA publication EPA/520-R-94-004, OSWER Directive 9902.3-2A, RCRA Corrective Action Plan (Final), May 1994.

G. RESPONSE ACTION COMPLETION REPORT (RACR)

The permittee shall submit a Response Action Completion Report (RACR) within the time frame required by the Executive Director, not to exceed one-hundred-eighty (180) days from the date of approval of the RAP Report. The RACR shall address all of the items for Corrective Measures Implementation (CMI) Workplans contained in the U.S. EPA publication EPA/520-R-94-004, OSWER Directive 9902.3-2A, RCRA Corrective Action Plan (Final), May 1994. If the RAP does not propose a permanent remedy, then a RAP shall be submitted as part of a new compliance plan application or as a modification/amendment application to an existing compliance plan. The Response Action Plan (RAP) shall contain detailed final engineering design and monitoring plans and schedules necessary to implement the selected remedy. Implementation of the corrective

## [IX.G.]

measures shall be addressed through a new and/or a modified/amended compliance plan. Upon installation of a corrective action system based upon the approved RAP, the permittee shall submit a Response Action Completion Report (RACR). To report the progress of the corrective measures, the permittee shall submit periodic Response Action Effectiveness Reports (RAER) to the TNRCC in accordance with the schedule specified in the compliance plan to show the progress of actions taken.

PERMIT SECTION X. AIR EMISSION STANDARDS

A. PROCESS VENTS AND EQUIPMENT LEAKS

1. Emissions from this facility must not cause or contribute to a condition of "air pollution" as defined in Section 382.003 of the Texas Health and Safety Code Ann. or violate Section 382.085 of the Texas Health and Safety Code Ann. If the Executive Director of the TNRCC determines that such a condition or violation occurs, the permittee shall implement additional abatement measures as necessary to control or prevent the condition or violation.

2. Requirements for Subparts AA and BB

a.. The permittee must comply with the requirements of 30 TAC Section 335.152(a)(17)/40 CFR Part 264 Subpart AA and 30 TAC Section 335.152(a)(18)/40 CFR Part 264 Subpart BB, as applicable.

b. The permittee shall include in the Biennial Report, required in Provision II.B.7., a statement that hazardous waste management units or associated ancillary equipment at this facility are not subject to any of the requirements in Provision X.A.2.a., if these requirements are not applicable to any hazardous waste management units or associated ancillary equipment at this facility. If at any time any hazardous waste management units or associated ancillary equipment become subject to the requirements in Provision X.A.2.a., the permittee must immediately comply with these requirements.

\*\* 3. Requirements for Subpart CC

The permittee must comply with the requirements of 40 CFR Part 264 Subpart CC, as applicable.

**ATTACHMENT A**

Site Legal Description

U. S. Army Air Defense Artillery Center and Fort Bliss

HW-50296-000

ISWR No. 63001

EPA ID No. TXD4213720101

### LEGAL DESCRIPTION

Property Description: A portion of Sections 16 and 17, Block 80, Township 2, Texas and Pacific Railroad Company surveys, El Paso County, Texas.

#### Metes and Bounds Description

The parcel of land herein described is a portion of Sections 16 and 17, Block 80, Township 2, Texas and Pacific Railroad Company Surveys, El Paso County, Texas, and is more particularly described by metes and bounds as follows:

Commencing at a found United States concrete monument with brass cap on the common section corner of Sections 15, 16, 21 and 22, Block 80, Township 2; Thence south  $88^{\circ} 49' 33''$  West, a distance of 4720.44 feet; Thence North  $01^{\circ} 10' 27''$  West, a distance of 1448.51 feet to a point, said point lying on an existing chain link fence, said point being the TRUE POINT OF BEGINNING of this description;

THENCE, along said fence line the following courses:

South  $88^{\circ} 03' 06''$  West, a distance of 476.33 feet;

North  $00^{\circ} 06' 50''$  West, a distance of 276.08 feet;

North  $88^{\circ} 04' 02''$  East, a distance of 469.72 feet;

South  $01^{\circ} 29' 04''$  East, a distance of 275.82 feet to the TRUE POINT OF BEGINNING of this description.

Said parcel of land contains 2.996 acres (130, 493 sq. ft.) of land more or less.

**ATTACHMENT B**

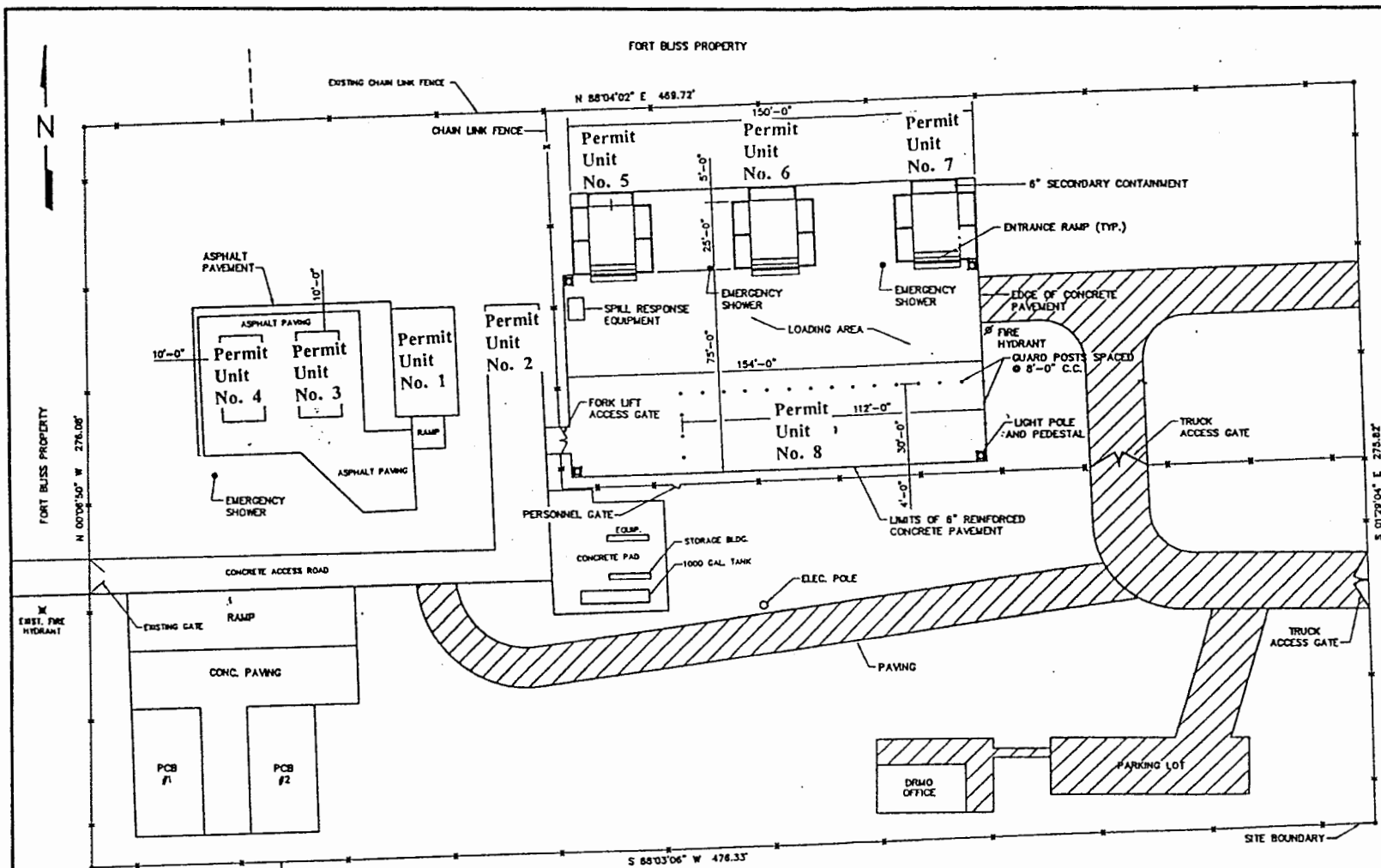
Facility Map

U. S. Army Air Defense Artillery Center and Fort Bliss

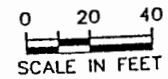
HW-50296-000

ISWR No. 63001

EPA ID No. TXD4213720101



FACILITY LAYOUT  
 HAZARDOUS WASTE  
 STORAGE FACILITY  
 BUILDING 11614 AREA  
 FORT BLISS, TEXAS



**ATTACHMENT C**

List of Incorporated Application Materials

U. S. Army Air Defense Artillery Center and Fort Bliss

HW-50296-000

ISWR No. 63001

EPA ID No. TXD4213720101

List of Incorporated Application Materials

The following is a list of Part A and Part B Industrial and Hazardous Waste Application elements which are incorporated into all Industrial and Hazardous Waste permits by reference as per Provision I.I.5.

TNRCC PART A Application Form

I. General Information

I.B. - Authorized Agents

I.C. - Identify entity who will conduct facility operation.

I.D. - Facility Ownership

III. Wastes and Waste Management

III.C.1. - Location of Waste Management Units - Topographic Map extending one mile beyond facility.

TNRCC PART B Application Form

I. General Information

I.A. - Applicant

I.C. - Facility Location - Address

III. Facility Management

III.B. - Personnel Training Plan

III.C. - Security

III.D. - Inspection Schedule

III.E. - Contingency Plan

III.E.1. - Arrangements with Local Authorities

III.E.2. - Emergency Coordinators List

III.E.3. - Emergency Equipment list

IV. Wastes and Waste Analysis

IV.B. - Table IV.B. - Waste managed in permitted units

IV.C. - Table IV.C. - Sampling and Analytical Methods

IV.D. - Waste Analysis Plan

V. - Engineering Reports

V.A.1. - General Information

V.A.3. - Detailed Plans & Specifications to show facility will be constructed and operated in compliance with all pertinent permitting requirements.

V.B. - Container Storage area engineering reports includes Table V.B. Container Storage Area Summary

V.B.1. - Containment System

V.B.2. - Wastes containing No Free Liquids

VI. Geology Report

VII. - Closure and Post-Closure Care Plans

VII.A. - Closure-complete Table VII.A. - Unit Closure Provide surface impoundment (non-liner) closure (if applicable) plans-other closure plans as applicable.

IX. - Releases from Solid Waste Units & Corrective Action

IX.B.App. I - Facility and SWMU Location Map

X. - Air Emission Standards

X.A. - Process Vents and Equipment Leaks



**ATTACHMENT D**

List of Permitted Facility Units

U. S. Army Air Defense Artillery Center and Fort Bliss

HW-50296-000

ISWR No. 63001

EPA ID No. TXD4213720101

Authorized Facility Units

| TNRCC Permit Unit No. | Unit Name                     | Unit Description       | Capacity       |
|-----------------------|-------------------------------|------------------------|----------------|
| 1                     | Building 11614, Unit 1        | Container Storage Area | 8,600 gallons  |
| 2                     | Container Storage Pad, Unit 2 | Container Storage Area | 31,900 gallons |
| 3                     | Storage Shed, Unit 3A         | Container Storage Area | 16,720 gallons |
| 4                     | Storage Shed, Unit 3B         | Container Storage Area | 16,720 gallons |
| 5                     | Modular Building, Unit 5      | Container Storage Area | 6,600 gallons  |
| 6                     | Modular Building, Unit 6      | Container Storage Area | 6,600 gallons  |
| 7                     | Modular Building, Unit 7      | Container Storage Area | 6,600 gallons  |
| 8                     | Container Storage Pad, Unit 8 | Container Storage Area | 47,520 gallons |