



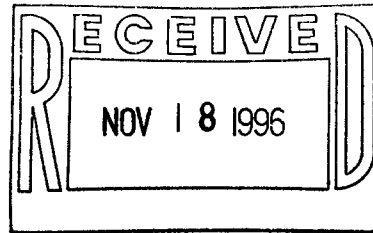
**DEPARTMENT OF THE AIR FORCE**

HEADQUARTERS 49TH FIGHTER WING (ACC)  
HOLLOMAN AIR FORCE BASE, NEW MEXICO

**18 NOV 1996**

MEMORANDUM FOR NEW MEXICO ENVIRONMENT DEPARTMENT

Attn: Mr. Cornelius Amindyas  
RCRA Permits Program Manager  
Hazardous and Radioactive Materials Bureau  
2044 Galisteo  
P O Box 26110  
Santa Fe NM 87502



FROM: 49 CES/CD  
550 Tabosa Avenue  
Holloman AFB NM 88330-8458

SUBJECT: Holloman AFB Resource Conservation and Recovery Act (RCRA) Part B  
Permit Modification for the Treatment Storage and Disposal Facility (TSDF)

1. This is to inform you of our intent to modify subject permit. We are attempting to update every attachment to better reflect the current activities at Holloman AFB. In order to properly accomplish this update, we request a meeting with your office during the first week of December to present a strategy plan and receive your input. With your guidance from the start of this project, we anticipate fewer opportunities for deficiencies. In addition to Holloman environmental personnel, Radian International will also attend to present a proposed agenda.

2. If you have any questions or require additional information, please contact Mr. David Scruggs, 49 CES/CEV, at (505) 475-3931.

*Howard E. Moffitt*  
HOWARD E. MOFFITT  
Deputy Base Civil Engineer

**Agenda**  
**Holloman AFB TSDF Permit Modification Meeting**  
**3 December 1996**

- I. Introduction of Participants**
  - NMED
  - Holloman AFB
  - Radian International
  
- II. Overview of Reasons for Modification**
  - Changes in Air Force, DRMO, DLA protocols
  - Ensure HAFB's ability to comply
  
- III. Discussion of Proposed Changes**
  - Review of attached outline
  - HSWA Corrective Action Provisions
  
- IV. Submittal Format**
  
- V. Schedule**
  
- VI. Other Issues**

**Outline of Proposed Modifications  
Holloman AFB TSDF Permit Modification Meeting  
3 December 1996**

**I. Modifications to Permit Modules**

No major modifications to the four main permit modules are requested. HAFB does request that NMED review citations of the New Mexico Hazardous Waste Management Regulations in the modules to ensure that they reflect New Mexico's current HSWA authority. HAFB would also like to review the HSWA provisions in Module IV with NMED.

**II. Waste Analysis Plan**

A new Waste Analysis Plan will be submitted. The primary changes will include changing the frequency of waste stream analysis from annually to analysis only when the process or the ingredients change (or if fingerprint analysis indicates that the material in the container does not match the documentation).

Additionally, provision will be made to allow qualified individuals from within HAFB or outside contractors meeting the qualifications to perform sampling and analysis. Analytical methods will also be updated to reflect current methods. This is necessary to provide HAFB the flexibility they need to remain in compliance with the permit under financial and manpower constraints while still meeting the requirements in 40 CFR 264.13.

**III. Container Management**

The Container Management attachment will be restructured into 2 main parts. The first will provide an accurate and up to date description of the facility and equipment. The second will discuss the container management requirements and the practical implementation of these requirements. The facility description will be updated to reflect current conditions and meet the requirements of 40 CFR 264 Subpart C. Text that is no longer accurate will be removed from the Attachment. The current container management section contains a substantial amount of information that was taken from previous editions of Defense Logistics Agency regulations, Department of Defense regulations, and DRMS protocols. In many cases, these guidelines contain operational protocols and are more specific than the state and federal regulations. Because these guidelines are constantly changing, HAFB would like to remove the specific requirements from the permit that are driven by them and address only state and federal requirements in the permit. This will keep HAFB from having to modify their permit each time one of the other protocols is modified. The revised container management protocol will be based upon 40 CFR 264 Subpart I.

**IV. Procedures to Prevent Hazards**

This section contains several Department of Defense and Air Force forms that are no longer current. Like container management, much of the section is aimed at complying with DRMS, DoD, and DLA protocols. Some of these protocols have changed and some are no longer applicable. HAFB would like to modify this section to reflect state and federal requirements and remove references that were included from other protocols. Specifically, the security plan is out of date and needs to be updated to reflect current security procedures and highlight the requirements that are from state and federal regulations. Also, the inspection schedule needs modification in order to facilitate its use by DRMO personnel. Updates to the security plan will be made in conjunction with 40 CFR 264.14. The inspection schedule will be modified in accordance with 40 CFR 264.15.

**V. Personnel Training**

The current section on Personnel Training refers to DRMS training manuals and courses that are out of date or are no longer used. Rather than modifying the permit each time DRMS modifies the training manuals, classes, or course names, HAFB would like to outline in the attachment the material that must be included in the program under 40 CFR 264.16. This outline would serve as the minimum outline for training. Additional instruction on current DRMS protocols would likely be included in the training program, but they would not be specified by the permit. Job titles, qualifications, and duties would also be modified as necessary to meet state and federal requirements rather than DRMS protocols.

**VI. Contingency Plan**

Holloman AFB maintains a current Contingency Response Plan for the base that is regularly updated. The purpose of the plan is to provide guidelines for dealing with hazardous waste-type emergencies. The plan identifies requirements for specific and non-specific locations on the base. The most current version of this plan will be the blueprint for the modified Contingency Plan since DRMO is required to follow the same general response requirements as the rest of HAFB. Contingency requirements specific to DRMO will also be addressed. Because the Contingency Response Plan is a dynamic document that is modified as needed, HAFB would like the permit to refer readers to the current version of the Contingency Response Plan when action is required. The revisions to the Contingency Plan will be based upon compliance with 40 CFR 264 Subpart D.

**VII. Closure Plan**

Significant modification of the Closure Plan is not anticipated. As part of the modification process, HAFB will review the plan to ensure that it still accurately represents their intentions. Specific issues that will be reviewed include waste inventories and quantities. Closure of the storage facility is not anticipated in the foreseeable future.

**RADIAN**  
INTERNATIONAL LLC

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6400 Uptown Blvd., N.E.  
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21 November 1996



Mr. Cornelius Amindyas  
New Mexico Environment Dept.  
Hazardous and Radioactive Materials Bureau  
2044 Galisteo  
Santa Fe, NM 87502

Dear Mr. Amindyas:

Enclosed you will find an outline of the proposed modifications to the Holloman AFB TSDF Operating Permit and a proposed agenda for our meeting scheduled for 3 December 1996. Please take a few minutes to review the outline prior to the meeting so that we will be able to address any issues or concerns you might have with the proposed modifications. Changes in Air Force protocols have necessitated these modifications in order to ensure that Holloman AFB can comply with the permit conditions now and in the future.

We look forward to discussing these issues with you in person and working together to modify the permit. If you have any questions prior to the meeting, please feel free to call me at (505) 878-1020.

Sincerely,

A handwritten signature in cursive script that reads 'Tracie Lundberg'.

Tracie Lundberg

Enclosures

cc: Gary Henderson, Radian International  
Tom Holcomb, Radian International  
David Scruggs, Holloman AFB  
Debbie Hartell, Holloman AFB