



STATE OF NEW MEXICO

ENVIRONMENTAL IMPROVEMENT DIVISION

P.O. Box 968, Santa Fe, New Mexico 87504-0968
(505) 984-0020

ENTERED

TONEY ANAYA
GOVERNOR

DENISE D. FORT
DIRECTOR

January 4, 1985

NOTICE OF DEFICIENCY

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Harry Davidson, Environmental Planner
Kirtland Air Force Base
Albuquerque, New Mexico 87117

Dear Mr. Davidson:

The Environmental Improvement Division has completed its initial ("completeness") review of your application to store hazardous waste, submitted on May 11, 1984. Your application has been found to be incomplete, and a detailed schedule of deficiencies is attached. A deficient permit application does not fulfill the requirements of Section 302.A.1.b., and Kirtland Air Force Base has, pursuant to 74-4-10 NMSA, 30 days from receipt of this letter to correct these deficiencies.

The passage of the Hazardous and Solid Waste Amendments of 1984 has increased the required scope of permit applications. The attached list of deficiencies does not include these new requirements. We have not made a complete study of the effect of these new requirements on Kirtland's application, but we have identified the following new areas which will eventually need to be addressed, perhaps among other new areas:

- 1) past releases of hazardous waste and/or hazardous constituents from any activity at KAFB since KAFB's inception;
- 2) a waste minimization plan; and
- 3) new waste analysis requirements.

The text and an EPA summary of the new law is attached for your convenience.

*Red file
KAFB
I*

SS




Harry Davidson
Page 2
January 4, 1985

I was sorry to hear that the proposed Building 1024 did not receive funding this year. As I'm sure you realize, a new building for which a permit is issued is not limited in size or cost, unlike an interim status modification. Under the new RCRA amendments, however, a permit must be issued before construction begins. Also note that the only buildings that currently have interim status as storage facilities are Buildings 615 and 28009; the use of any other buildings must be preceded by the EID approval of a revised Part A application.

If you have any questions about this Notice, please contact Mr. Trent Thomas at 984-0020, ext. 340.

Sincerely,



Peter H. Pache
Program Manager
Hazardous Waste Section

PHP/TT/mp

cc: LaVona Remakel, Kirtland DPDO
Susan Stark, EPA Region VI
Jaime Wright, EPA Region VI

Attachments: Deficiency Checklist
1984 RCRA Amendments Summary
1984 RCRA Amendments Text
Certification Forms

**COMPLETENESS DEFICIENCY LIST FOR THE KIRTLAND AIR FORCE BASE,
ALBUQUERQUE, NEW MEXICO MAY 11, 1984, PART B APPLICATION
NM9570024423**

| <u>Deficiency No.</u> | <u>Location in Application</u> | <u>HWMR-2 Citation</u> | <u>Deficiency</u> |
|-----------------------|--------------------------------|------------------------|---|
| 1. | Section A | 302.A.4.a.(b) | On the reverse of EPA Form 3510-1, Kirtland Air Force Base (KAFB) does not have a RCRA permit. A correct Form 3510-1 was submitted to EPA on March 23, 1984, and needs to be also included here. |
| 2. | Section A | 302.A.4.a. (14) | KAFB's proposed Building 1024 is not shown on this Part A. It was shown on an unsigned Part A modification submitted to EID on April 30, 1984, and should also be included here. Any other buildings KAFB may want to use for the storage of hazardous waste must also be included here. |
| 3. | Section A | 302.A.4.a. (14) | On lines 1 and 9, the process codes S02, T01, and T04 are shown. These codes (for tank storage, treatment in a tank, and chemical/physical/biological treatment respectively) contradict, in the case of line 1, the April 30 submittal, and in all three cases contradict the second paragraph of Section B. In addition, some of the waste quantities and waste types shown in Section A do not agree with the April 30 submittal. On the basis of information given to EID during the permit review inspection on December 10, 1984, the EID has determined that codes S02, T01, and T04 do not apply to the indicated processes at KAFB. The codes T01 and T04 were applied to the collection in a closed sump and subsequent gravity separation of a very dilute stream of stripped paint and water that results from touch-up work on |

aircraft. The sludge that results from this separation may be a hazardous waste (and, if so, the code S01 will apply to its storage in containers), but it is the judgement of EID that the overall waste stream is not a hazardous waste. The code S02 was used to describe a storage tank that has always contained saleable fuel materials. In order to remove these three items from the permitting process without formal closure, it is necessary for KAFB to certify that these codes were always and still are inapplicable to KAFB's operations. Certification forms for all three processes accompany this schedule.

4. Section A 302.A.4.a. (13)

No photographs of existing storage structures and of the site of the future storage structure were included.

5. Page B-2 203., 205.

There needs to be language in the first paragraph of this page reflecting the applicability of Section 203. and 205. to shipments of hazardous waste received from off-site generators. As an alternative to this approach, KAFB may state in this section that it will never receive hazardous waste from off-site. If KAFB elects to use this approach, references to the waste analysis requirements of Section 203.C.1.e. may be ignored in Deficiency No. 8.

6. Page B-2 204.A.3.

The issue of when a surplus property becomes a waste must be discussed in KAFB's Part B. The following language is suggested:

Used materials are wastes unless they can be certified by facility personnel to have a reasonable probability of re-use or reclamation. Off-specification chemicals and

degraded chemicals which no longer meet commercial standards are also wastes unless they can be similarly certified. In addition, KAFB can demonstrate that it has distinguished between wastes and materials potentially destined for use by keeping these two categories of materials in separate locations.

7. Page B-2 Mb 302.A.4.b. (1) (a) 41 2030 The date given for closure of existing storage facilities is no longer correct.
8. Section C 203.C.1.e., 204.A.3., 206.B.3. Section C, entitled "Waste Characteristics," is based entirely on the general waste analysis requirements of 206.B.3. KAFB's wastes are, however, being stored prior to shipment, and these requirements are not sufficient, in every case, to meet the generator requirements of 204.A.3. In addition, KAFB may receive wastes from off-site generators, and so must comply with the TSD standards of 203.C.1.e. regarding inspection of shipments received. KAFB's wastes must, therefore, be characterized according to the following matrix:

3

| | <u>On-site generation</u> | <u>Off-site generation *</u> | <u>*off-site generators must do</u> |
|-----------------|--------------------------------|-----------------------------------|-------------------------------------|
| Group I wastes | 206.B.3., 204.A.3. Group IA | 206.B.3., 203.C.1.e. Group IB | 204.A.3. characterization. |
| Group II wastes | 206.B.3., 204.A.3. Group IB | 206.B.3., 203.C.1.e. Group IIB | |

KAFB's proposed characterization of Group I wastes is generally adequate, with the exception of the omission of language reflecting the responsibilities of off-site generators to characterize their

waste according to 204.A.3., and a specific regulatory cite to KAFB's responsibilities under 203.C.1.e. Alternative to this four-group approach, Kirtland can declare that it will never receive hazardous waste from off-site generators, as noted above.

8a. Table C-2 204.A.3. (This deficiency and the following two are subsets of Deficiency 8.) The parameters in this table are not sufficient to characterize Group II wastes prior to shipment, as required by 204.A.3. In addition, they are not appropriate to meet the requirements given in 203.C.1.e. for receipt of Group II wastes from off-site generators. KAFB must develop an analytical scheme that can be used to summarize examine each kind of waste received, in accordance with 203.C.1.e.

not considered by applicant

8b. Table C-3 204.A.3. 203.C.1.e. This table of test methods will need to be revised as Table C-2 is revised to meet the requirements of 204.A.3. and 203.C.1.e. The Bielstein test will not provide the compound-specificity needed to meet these requirements.

not considered by applicant

8c. Section C-2e. 203.C.1.e. 206.B.3.b.(5) While the procedure described for Group I wastes received from off-site is adequate, the procedure for Group II wastes is not adequate and must, as noted above, include more detailed analysis. The KAFB waste analysis plan must specify, as required in 206.B.3.b. (5), the analyses to be supplied by off-site generators.

not considered by applicant

4

9. Appendix D 206.B.3., 204.A.3. The F-code wastes included in Appendix D do not meet the definition of "Group I" wastes given on page C-1 and apparently should be moved to Appendix E.

- 15. Section F-4 206.B.9.d. KAFB must supply a schedule showing when these items will be tested. *not addressed*
- 16. Page F-6 206.B.9.e. KAFB has omitted mention of how it will meet these requirements. *not addressed* ✓
- 17. Appendix H 206.B.9.h. KAFB must supply an active version of this memorandum. ✓
- 18. Section F-6 206.B.9.h. KAFB must document the arrangements made with the Albuquerque Hazardous Materials Response Team that were mentioned to EID inspectors on 2/23/84. *not addressed*
- 19. Section G 206.B.10, 302.A.4.b. (1) (g) KAFB's contingency plan is deficient in many areas and In general, the organization of the plan is difficult to follow and it lacks a table of contents; the plan makes liberal use of acronyms, some of which are nowhere defined and some of which are apparently inconsistent; and finally, it does not cite regulatory requirements or incorporate regulatory language to an extent sufficient to clarify that the intent of the regulations is being met. The following lettered entries address some of the contingency plan's deficiencies:
- 19a. Page G-3 206.B.10.a. KAFB's contingency plan must be authorized by both the owner and the operator; both are responsible for mitigating releases. KAFB's plan is currently authorized by the owner only. ✓
- 19b. Page G-3 206.B.10.b. KAFB's contingency plan must contain language specifically committing KAFB to cleaning up any release of hazardous waste or hazardous waste constituents, even those which have not been foreseen in writing the plan.

19c. Page G-3

206.B.10.m. (5) KAFB's emergency coordinator(s) must be specifically authorized by the owner and operator to commit whatever resources are needed to mitigate releases. It is not at all clear who really is the emergency response coordinator: the chief of the DPDO, the chief of the emergency response team, or the chief of the installation response center.

19d. Page G-3

302.A.4.b.(1) (g) KAFB's contingency plan should be drawn up to meet permitting (not interim status) standards.

19e. Section G

206.B.10.d. KAFB's plan must describe the actions facility personnel must take in response to fires, explosions, and releases. The language used throughout the plan is indefinite.

19f. Page G-4

206.B.10.f. KAFB's contingency plan does not describe exactly who the "host emergency spill team coordinator," and the "KAFB emergency spill response team" are or how "coordination" with them will be accomplished.

19g. Appendix A

206.B.10.g. The required information must be supplied for both DPDO and KAFB emergency response personnel; it is fully supplied for neither.

19h. Appendix A

206.B.10.i. The contingency plan does not say how the emergency coordinator will be "on call" at all times.

19i. Section G

206.B.10.h. The contingency plan lacks this list and map. Neither is there any map showing where the hazardous waste storage areas at Kirtland are or will be, and showing the kinds of waste stored in each location.

| | | | |
|------|-----------|-------------------------|---|
| 19j. | Section G | 206.B.10.i. | The contingency plan lacks an evacuation plan. One is needed for Building 1024. |
| 19k. | Section G | 206.B.10.j. (2) | There is no documentation that this contingency plan has been submitted to coordinating agencies, either within the KAFB institutional umbrella or outside of it. |
| 19l. | Page G-5 | 206.B.10. m. (1) (b) | There is no mention of the circumstances under which emergency response personnel from outside the KAFB umbrella will become involved or how they will be notified. |
| 19m. | Page G-5 | 206.B.6.a. | While formally this citation is a portion of the personnel training requirements, KAFB is correct in assuming that emergency response personnel must be properly trained. KAFB's contingency plan must specifically reference its personnel training plan to describe this training. |
| 19n. | Page G-5 | 206.B.10. m. (4) | The plan must explicitly contain a description of the notification requirements of this section. |
| 19o. | Section G | 206.B.10. h. | These requirements are not addressed in the plan. |
| 19p. | Page G-6 | 206.B.10. m. (10) | It is not clear from the plan how these requirements will be met. KAFB's forms do not contain all this information, and no specific meaning is given to "final reports" in item 2. (h) on page G-6. It is not clear when the information required on page 12 will be developed, or whether it will be submitted to EID. |
| 19q. | Page G-7 | 206.B.10. m. (3) | No guidance is provided in the plan to assist with this assessment. In item 2.(i), for example, there is no definition |

19r. Page G-7

of "medium" or "major" releases.

206.B.10.f. The chain of command here appears circuitous, and underscores concern that there is no well-defined emergency coordinator at KAFB.

19s. Page G-7, 8

206.B.10.d. Sections 3 and 4 are vague and must be much more specific to meet the requirements of this section. The subsequent section (d.) appears to cover the same ground as the preceding section, and a person responding to an emergency appears to have to read through two parallel sections of text. Diagrams, tables, and/or organizing devices should be employed to make this manual more "user-friendly" in an actual emergency. In particular, types of releases and other contingencies must be described and generic responses shown for these releases.

19t. Page G-8

206.B.10.i. The meaning, location, and responsibilities of the "command post" are unclear.

19u. Page G-9

206.B.10.m. (1) (b) The fire department must be alerted if there is an imminent, as well as an actual, fire.

20. Page I-4

302.A.4.b.(1) (i) All buildings except Building 615 need to have a continuously exhausting fan system, with both high and near-floor intakes, to prevent the accumulation of ignitable or explosive vapors.

21. Page J-2

302.A.4.b.(1) (j) A map of the roads and traffic patterns near Building 1024 must be provided, including the number and path(s) of the fuel trucks serving the nearby fuel storage facility. Traffic volumes on Kirtland Road are not required at this time but may be required if the

13

- proposed access to and from Building 1024 appears at all problematic. Drawing 4 is not detailed enough to provide the information required.
22. Page L-6 302.A.4. The sentence, "If classroom
b. (1) (I) instruction can't be
206.B.6.b. scheduled within 6 months,
then it will be scheduled as soon
thereafter as is possible," must
be deleted in order to meet
these regulatory requirements.
23. Section L-5 302.A.4. Mr. Frank Sedillos appears to
b. (1) (I), occupy two separate
206.B.6.d. positions at KAFB.
24. Section M 302.A.4.b. The regulatory standards of
(1) (m) 206.D., not 206.C., are referred
in this section. It is these
requirements that must be the
basis for KAFB's closure plans. *addressed*
25. Section M-1c, Table M-1 206.D.2. The maximum waste
c. (1) (b) inventories given for
206.B.9.g. Buildings 28009 and 1024
appear reasonable. The EID will
not be able to evaluate these
maximum inventories, however,
until diagrams of these two
buildings are provided, showing
the location of each drum or
pallet of drums, the aisles
provided, and space occupied
by safety equipment. These
diagrams must identify the
locations reserved for each
(incompatible) category of
waste.
26. Section M-1d 203. KAFB cannot sell hazardous
waste without the use of a
hazardous waste manifest.
Once KAFB declares material to
be regulated hazardous waste,
it can no longer sell this
material through normal DPDO
channels but must dispose of it
strictly following the provisions
of the HWMR-2. This may lead
KAFB to avoid labelling
containers as waste until it is
preparing to ship them to a

permitted treatment, storage, or disposal facility. This approach is acceptable if:

- 1) All materials which are known to be unsaleable hazardous wastes are labelled as such as soon as this is known.
- 2) Hazardous "potential wastes" are accorded the same storage, record-keeping, handling, and other treatment methods as known wastes, with the sole exception of labelling. Potential hazardous wastes must be labelled in sufficient detail to allow any person familiar with the HWMR-2 to draw up a legal hazardous waste label based only on information given on the "potential hazardous waste" label. The information retained in KAFB's operating record for these "potential wastes" must be adequate to draw up a Uniform Hazardous Waste Manifest for these materials, should they prove unrecyclable.

| | | | |
|-----|--------------|---|---|
| 27. | Section N | 301.A. 302.A.2. | The owner (KAFB) and the operator (DPDO) of KAFB's storage facility must submit this Part B jointly, as in the case of the Part A application, in accordance with the "owners and operators" language in 301.A. and elsewhere in the HWMR-2. <i>addressed</i> |
| 28. | Drawings 1-3 | 302.A.4. b. (1) (r) parts (ii), (vii) and (ix) | The maps of KAFB provided did not show the 100-yr. floodplain area and did not show injection and withdrawal wells. Legal property boundaries of KAFB must be shown, including the boundaries of any inclusions owned by DOE or other parties. |
| 29. | Page H-7 | 302.A.4. b. (2) (a) | If the volume contained by the sloped floor is to |

(i) B.

be counted in the total secondary containment volume, KAFB must state, in writing, that all containers will be kept on pallets that will hold them above any liquid held in the secondary containment system.

P 612 424 364
RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL

(See Reverse)

* U.S.G.P.O. 1983-403-517

| | | |
|---|-------------------|---|
| Sent to | Harry Davidson | |
| Street and No. | Kirtland AFB | |
| P.O., State and ZIP Code | Albuquerque, N.M. | |
| Postage | \$ 8.11 | X |
| Certified Fee | | X |
| Special Delivery Fee | | |
| Restricted Delivery Fee | | |
| Return Receipt Showing to whom and Date Delivered | | X |
| Return receipt showing to whom, Date, and Address of Delivery | | |
| TOTAL Postage and Fees | \$ | X |
| Postmark or Date | | |

PS Form 3800, Feb. 1982

11, JULY 1982

Items 1, 2, 3, and 4.
 your address in the "RETURN" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
 Show to whom and date delivered X
 Show to whom, date, and address of delivery ..
 2. RESTRICTED DELIVERY
 (The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$ X

3. ARTICLE ADDRESSED TO:
 Harry Davidson, Enw. Plans
 Kirtland Air Force Base
 Albuquerque, N.M. 87111

4. TYPE OF SERVICE: ARTICLE NUMBER
 REGISTERED INSURED
 CERTIFIED COD
 EXPRESS MAIL
 P-612-424-364

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent
 Charles J. [Signature]

5. DATE OF DELIVERY
 7 Dec 88

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS
 MSB

POSTMARK
 (may be on reverse side)
 ALBUQUERQUE, N.M.
 DEC 7 1988

RETURN RECEIPT

* GPO: 1982-379-593