



BRUCE KING
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

ENTERED

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

November 18, 1994

Mr. Walter Darr, Chief
Compliance Environmental Management Division
1606 Air Base Wing
2000 Wyoming Blvd. SE
Kirtland Air Force Base
Albuquerque, New Mexico 87117

**RE: Notice of Deficiency (NOD) - Technical Adequacy of KAFB's
Open Burning Permit Application
EPA ID No. NM9570024423**

Dear Mr. Darr:

The Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department (NMED) has reviewed for technical adequacy, the July 1994 Kirtland Air Force Base (KAFB) permit application for the Open Burn Treatment Unit as required under the New Mexico Hazardous Waste Regulations.

After reviewing the permit application the HRMB has found the application to be technically deficient. The enclosed attachment lists the information necessary for NMED to consider the application to be technically complete and to begin preparation of a draft permit.

The information requested in the attachment must be submitted to NMED within thirty (30) days of receipt of this NOD. Failure to submit the required information in this designated time may result in a decision to consider the application unacceptable under RCRA regulations and the issuance of a Notice of Intent to Deny (NOID) a permit.

KAFB1537



Page 2
Mr. Darr, KAFB
November 18, 1994

If you have any questions about how detailed any response should be, contact Mr. Cornelius Amindyas at (505) 827-4308 for further discussion.

Sincerely,

A handwritten signature in cursive script, appearing to read "Benito Garcia".

Benito Garcia, Chief,
Hazardous and Radioactive Materials Bureau

cc: Barbara Hoditschek, HRMB
Tracy Hughes, NMED
David Neleigh, EPA Region 6
File Red-94



BRUCE KING
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

ATTACHMENT

NOTICE OF DEFICIENCY

Open Burn Technical Adequacy Review

November 18, 1994

A. Facility Description: 20 NMAC 4.1(effective September 23, 1994), Subpart IX, 40 CFR §270.14(b) (1)

The application must:

- (1) provide general dimensions and a structural description of the open burn (OB) treatment unit (to include trench design, for example, an active trench with adjacent buried trenches, or a single active trench that is groomed and reused).
- (2) include specifications for a secondary containment around the OB device, since the part B application, Section 8 contains a description of Composite Liquid Waste Sampling (COLIWASA) methods.
- (3) include engineering drawings that describe the unit's dimensions horizontally and vertically and shows ramps, berms, fencing and any other man-made features used in association with the unit;
- (4) provide the best available description of all wastes that have ever been managed at the OB unit (summarize historical information on the volume and composition of these wastes).

B. Topographic Map as required by 20 NMAC 4.1(effective September 23, 1994), Subpart IX, 40 CFR 270.14(b) (19).

The permit application must include revised/corrected versions of the maps titled Figure 1-2, and Figure 1-3 and on these maps also:

1. show the terrain for a distance of 1,000 feet outside the OB unit at a map scale of 1 inch equal to not more than 200 feet with appropriate contour lines;
2. indicate the correct location of the Open Burn (OB) container device relative to the Open Detonation(OD) treatment unit, and the personnel bunker. The OD pit should be located west of the OB container device, while the latter should be directly south of the personnel bunker. (This observation was made by an HRMB staff member during a visit to the OB/OD units on February 1, 1994).
3. include a wind rose diagram showing prevailing wind directions and velocities;
4. show the legal boundaries of the OB unit (i.e. the extent of the fence surrounding the OB treatment unit, beyond which it is safe for qualified OB personnel to be during Open Burn activities);
5. indicate access control to the OB treatment unit;
6. clearly label any on-site or off-site wells, buildings, and drainage and flood control barriers;
7. indicate buildings on- and off-site, public roadways, and passenger railways; and
8. enumerate all Solid Waste Management Units (SWMUs) that are in the vicinity of the OB unit.

C. Process Information as required in 20 NMAC 4.1, (effective september 23, 1994), Subpart IX, 40 CFR 270.23

The application must:

1. provide a comprehensive description of the lining materials within and below the OB device and the depth of the lining material below the device;
2. describe the provisions for leak detection in and around the OB containment device;
3. describe the precipitation cover to be used during non-operational periods (for prevention of accumulation of precipitation), its material of construction, applicable physical properties, and the methods of covering the OB device;

4. describe methods to control deterioration of the material used in construction of the OB device;
5. explain the methods of controlling releases of pyrotechnics, explosives, and propellants ashes and residues to ground water and air during OB. The information provided in Section 3.3.3. of KAFB's part B permit application is insufficient;
6. describe how wind dispersal of residual ash from OB will be controlled during and between burns.